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11	[Fining 100 themps, 60); codes, § 5103]	
12	IN THE UNITED STAT	ES DISTRICT COURT
13	FOR THE NORTHERN DIS	TRICT OF CALIFORNIA
14		
15	THE DEPARTMENT OF FAIR EMPLOYMENT) AND HOUSING, an agency of the State of	Case No. CV 12-1830-EMC
16	California,	FIRST AMENDED GROUP AND CLASS
17	Plaintiff,)	ACTION COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF
18	vs.	AND INJUNCTIVE RELIEF
19	LAW SCHOOL ADMISSION COUNCIL, INC.,	[FEHA, Gov. Code, § 12900 et seq. and
20	a Delaware tax exempt corporation,)	Unruh Civil Rights Act, Civ. Code, § 51 et seq.]
21	Defendant.)	
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3-95 auci	Dept. Fair Empl. & Hous. v. Law School .	Admission Council, Inc. (Whitney et al.)

	JOHN DOE, JANE DOE, PETER ROE, PAYMOND BANKS KEWIN COLLING	anded
	RODNEY DECOMO-SCHMITT, ANDREW GROSSMAN ELIZABETTE LENNIESSEY	
- Annie and Anni	SEVERSON, OTILIA IOAN, ALEX JOHNSON,	
dimesari discussione	ANDREW QUAN, STEPHEN SEMOS,	
A CHARLES AND A CHARLES AND A CHARLES	VIELBAUM, AUSTIN WHITNEY, and all other similarly situated individuals,	
***************************************	Real Parties in Interest.	
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Plaintiff DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING (Department or DFEH) alleges the following against defendant LAW SCHOOL ADMISSION COUNCIL, INC. (LSAC), a Delaware tax exempt Corporation:

PARTIES

- 1. DFEH is the state agency charged with enforcing the right of all Californians under the Unruh Civil Rights Act (Unruh Act) (Civ. Code, § 51 et seq.) "to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever." (Civ. Code, § 51, subd. (a).) Government Code section 12948 makes a violation of the Unruh Act a violation of the Fair Housing and Employment Act (FEHA) (Gov. Code, § 12900 et seq.). The FEHA empowers the DFEH to investigate and prosecute Unruh Act claims within the state, including those that adversely affect, in a similar manner, a group or class. (Gov. Code, §§ 12961, 12965.)
- 2. Each real party in interest, John Doe, Jane Doe, Peter Roe, Raymond Banks, Kevin Collins, Rodney Decomo-Schmitt, Andrew Grossman, Elizabeth Hennessey-Severson, Otilia Ioan, Alex Johnson, Nicholas Jones, Caroline Lee, Andrew Quan, Stephen Semos, Gazelle Taleshpour, Kevin Vielbaum, and Austin Whitney, applied to LSAC for reasonable accommodations on the Law School Admissions Test (LSAT) between January 19, 2009 and the present. Each real party was denied a reasonable accommodation, either in whole or in part, within this same time frame. At the time of applying for reasonable accommodations, each real party resided in California.
- 3. Real parties in interest John Doe, Jane Doe, and Peter Roe wish to participate in this litigation anonymously. Each real party seeks to retain their privacy interest in the details of their disability and need for accommodation. Each of these real parties has expressed a legitimate fear of negative professional ramifications should their true names be associated with this litigation. A motion requesting the court's permission to proceed under fictitious names for these two real parties is filed concurrently with this complaint.



4.	At all times relevant to this complaint, LSAC was a business establishment as defined
by Civil Code	section 51, subdivision (b). LSAC offers and administers its LSAT at multiple
locations in the	e State of California several times a year.

5. The DFEH is informed and believes and thereon alleges that, at all times mentioned herein, each and every defendant is and was, in doing the things complained of herein, the agent or employee of their co-defendants herein and was acting within the scope of said agency, service, employment, or representation, and that each and every defendant herein is jointly and severally responsible and liable to the real party for the damages hereinafter alleged.

GROUP ACTION ALLEGATIONS

6. The DFEH brings this case on behalf of a group of 17 named individuals.

CLASS ACTION ALLEGATIONS

- 7. Class Definition: The DFEH also brings this case as a class action, on behalf of: all disabled individuals in the State of California who requested a reasonable accommodation for the Law School Admission Test (LSAT) from January 19, 2009 to the present. The DFEH alleges that everyone within this class was subjected to LSAC's unlawful policies of discouraging requests for accommodation, requiring excessive documentation, and requesting unlawful information about mitigation measures. Within this class is a subclass of people who took the LSAT with the condition of extended time and were thereafter subjected to discriminatory treatment and retaliation because of this accommodation. These two classes are defined as follows:
- a. <u>Unlawful Discouragement and Consideration of Mitigation Measures</u>: All disabled individuals in the State of California who requested a reasonable accommodation for the LSAT from January 19, 2009 to the present.
- b. <u>Differential Treatment and Retaliation Against Examinees Granted Extended</u>

 <u>Time</u>: All disabled individuals in the State of California who took the LSAT with the accommodation of extra time from January 19, 2009 to the present.
- 8. Class Representative: The Director of the DFEH, with the assistance of the 17 named real parties in interest, will fairly and adequately represent the class. Government Code section 12961

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authorizes the Director to pursue this litigation as a class representative. Section 12961 authorizes the DFEH to seek class relief without being certified as the class representative. Nonetheless, this lawsuit meets the criteria for class certification.

- Manageability: Class treatment of this dispute would save time and money by bringing all like claims before this court. For LSAC policies that affect a large group of applicants in a similar fashion, such as subjecting applicants to unlawful inquiries and flagging certain scores. treatment as a class is a superior method of adjudication, as compared to multiple individual suits where each plaintiff would allege an identical harm. Class treatment would neatly aggregate these claims, preventing duplicative litigation and potential inconsistencies in the ultimate findings.
- Numerosity: The class is estimated to include hundreds of LSAT applicants. If would 10. be impracticable to join each of these applicants who requested reasonable accommodation during the three-year time frame and to bring them individually before the court for adjudication. The members of this class are fully ascertainable and there exists a probability that the individual members will ultimately be available to come forward to prove their separate damage-related claims to a portion of the total class recovery, if any.
- Commonality: There exists for the class a well-defined community of interest such 11. that common questions of both law and fact predominate over individual interests or claims.
- 12. Typicality: The class claims raised by the real parties in interest are typical of those held by other members of the class. Each applicant for reasonable accommodation was subject to an unlawful inquiry about mitigation measures, and each test-taker, who was granted extra time, had his or her test score segregated and flagged.
- 13. Adequacy of Representation: With the assistance of the real parties in interest, the DEFH will fairly and adequately represent the interests of all members of the class in the adjudication of their similar legal claims.

JURISDICTION AND VENUE

14. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 14, inclusive, as if fully set forth herein.

·	15.	This action arises under the FEHA, specifically Government Code section 12948,
which	incorpo	rates the Unruh Act into the enforcement structure of the FEHA, giving the DFEH
jurisdi	ction ov	er Unruh Act violations occurring within the state. By virtue of its incorporation into
the Un	iruh Act	, a violation of the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C. § 1210
et seq.) also co	onstitutes a violation of the Unruh Act. (Civ. Code, § 51, subd. (f).)

- 16. At all times relevant to this complaint, LSAC was a business establishment as defined by Civil Code section 51, subdivision (b), LSAC offers and administers its LSAT at multiple locations in the State of California several times a year.
- 17. At all times relevant to this complaint, real parties in interest John Doe, Jane Doe, Peter Roe, Raymond Banks, Kevin Collins, Rodney Decomo-Schmitt, Andrew Grossman, Elizabeth Hennessey-Severson, Otilia Ioan, Alex Johnson, Nicholas Jones, Caroline Lee, Andrew Quan, Stephen Semos, Gazelle Taleshpour, Kevin Vielbaum, Austin Whitney, and all other similarly situated individuals, were "persons" within the meaning of Government Code section 12925, subdivision (d), and Civil Code section 51, subdivision (b).
- 18. On May 9, 2010, Jane Doe filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied her full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A redacted copy of this complaint is attached hereto as Exhibit 1.
- 19. On January 12, 2010, Nicholas Jones filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 2.
- 20. After receiving the complaints of Jane Doe and Mr. Jones, and beginning an investigation into their allegations, the Department came to believe that LSAC's policies and practices toward disabled applicants requesting reasonable accommodation were affecting a larger group or class of applicants in a similar manner.



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2	.1.	On July 22, 2010, the Department issued a document entitled "Notice of Class Action
Complai	nt and	Director's Complaint" describing the affected group or class as "all disabled
individu	als in	the State of California who have or will request a reasonable accommodation for the
Law Sch	ool A	dmission Test (LSAT), administered by the LSAC, and who have or will be unlawfully
denied s	uch re	quest from January 19, 2009 to the conclusion of the Department's investigation of thi
complair	at." A	redacted copy of this complaint is attached hereto as Exhibit 3.

- 22. During its investigation of the class action and Director's complaint, the DFEH propounded administrative discovery to determine whether other people had been harmed by LSAC's discriminatory practices within the state. The DFEH's efforts to obtain this information from defendant included the filing of a superior court petition to compel LSAC to respond to its discovery requests. Although Government Code section 12960, subdivision (d), provides that the DFEH has one year from the date of the filing of its complaint until the filing of its accusation, this time is extended by the pendency of a court action to enforce administrative discovery. (Gov. Code, § 12963.5, subd. (f).) Therefore, this action is timely filed.
- With the court's assistance, the DFEH was able to discover and notify other persons who were harmed by defendant's discriminatory practices. Some of these people elected to file individual complaints as follows.
- On August 29, 2011, Alex Johnson filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 4.
- 25. On August 31, 2011, John Doe filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A redacted copy of this complaint is attached hereto as Exhibit 5.

- 26. On September 26, 2011, Elizabeth Hennessey-Severson filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied her full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 6.
- 27. On October 3, 2011, Caroline Lee filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied her full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 7.
- 28. On October 6, 2011, Raymond Banks filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 8.
- 29. On October 7, 2011, Gazelle Taleshpour filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied her full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 9.
- 30. On October 11, 2011, Peter Roe filed a verified complaint of discrimination in writing with the Department pursuant to section Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A redacted copy of this complaint is attached hereto as Exhibit 10.
- 31. On October 11, 2011, Stephen Semos filed a verified complaint of discrimination in writing with the Department pursuant to section Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation



of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 11.

- 32. On October 14, 2011, Rodney DeComo-Schmitt filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 12.
- 33. On October 17, 2011, Andrew Grossman filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 13.
- 34. On October 19, 2011, Kevin Collins filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 14.
- 35. On October 24, 2011, Otilia Ioan filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 15.
- 36. On October 28, 2011, Andrew Quan filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 16.

- 37. On October 28, 2011, Austin Whitney filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 17.
- 38. On November 7, 2011, Kevin Vielbaum filed a verified complaint of discrimination in writing with the Department pursuant to Government Code section 12960, alleging that LSAC unlawfully denied him full and equal access to the LSAT within the preceding one year, in violation of the FEHA and Unruh Act. A true and correct copy of this complaint is attached hereto as Exhibit 18.
- 39. On February 6, 2012, the DFEH issued a Group and Class Accusation before the California Fair Employment and Housing Commission (Commission), charging LSAC with violations of the Unruh Act. The Group and Class Accusation was properly served on LSAC by certified mail.
- 40. On February 17, 2012, the DFEH issued a First Amended Group and Class Accusation before the Commission. This accusation was properly served on the LSAC by certified mail.
- 41. Pursuant to Government Code section 12965, subdivision (c)(1), LSAC elected to have this dispute heard in civil court in lieu of a hearing before the Commission, and so notified the Department in writing, on or about February 22, 2012. A true and correct copy of "Respondent's Notice of Transfer of Proceedings to Court" is attached hereto as Exhibit 19.
- 42. The Department has withdrawn its accusation and has timely filed this complaint pursuant to Government Code section 12965, subdivision (c)(2).
- 43. The harm that is the subject of this complaint occurred throughout the State of California. Three of the real parties in interest lived in the County of Alameda at the time that they were denied full and equal accommodations in the testing process.
- 44. The amount of damages sought by this complaint exceeds the minimum jurisdictional limits of this court.



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FACTUAL ALLEGATIONS

The Law School Admissions Test (LSAT)

- 45. The LSAT is a half-day, standardized test administered four times each year at designated testing centers throughout the State of California. It purports to provide a standard measure of acquired reading and verbal reasoning skills that law schools use to assess applicants.
- 46. The test consists of five 35-minute sections of multiple-choice questions. A 35-minute writing sample is administered at the end of the test. Defendant does not score the writing sample, but sends it on to the law schools with the scores.
- 47. The LSAT is designed to measure reading and comprehension skills, the ability to organize and manage information, and analytical skills such as evaluation and criticism.
- 48. The three multiple-choice question types in the LSAT are labeled reading comprehension, analytical reasoning, and logical reasoning. All candidates take one additional multiple-choice section, which is experimental.

LSAC Business within the State

- 49. LSAC offers and administers its LSAT at multiple locations in the State of California four times a year, typically at law schools and universities. Applicants pay a test registration fee of \$139 after creating an online account and filling out the online application form. Additional fees charged by LSAC include \$68 for late registration, \$35 to change the test date, and so on.
- 50. LSAC pays local proctors to administer the exam on site. LSAC also pays for accommodations at the site, such as readers or scribes.
- 51. LSAC offers a Credential Assembly Service to law schools and law school applicants, which streamlines the law school admission process by allowing transcripts, recommendations and evaluations to be sent one time to LSAC. LSAC, in turn, summarizes and combines a law school applicant's LSAT score, writing samples, transcripts, recommendations, and evaluations into a report to an applicant's prospective law schools. The Credential Assembly Service also includes access through an applicant's LSAC account to electronic applications for all ABA-approved law schools.

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Applicants are charged \$124 to register for the Credential Assembly Service and \$16 for law school reports.

52. LSAC provides a series of LSAT preparatory guides, manuals and compilations of sample LSATs for purchase via its Web site, which materials range in price from \$8 to \$39.96. LSAC also sells a guide to ABA-approved law schools for \$26 and a skill readiness inventory for \$29.95.

The LSAC Accommodation Request Process

- 53. LSAC requires candidates requesting a reasonable accommodation to utilize its standard forms and procedures. Applicants making an accommodation request for a so-called cognitive or psychological impairment are required to provide psychoeducational/ neuropsychological testing and a full diagnostic report, including comprehensive aptitude and achievement testing.
- 54: LSAC requires each applicant to disclose whether he or she took prescribed medication during the evaluation process and to provide an explanation for any failure or refusal to take the medication.
- 55. LSAC has a policy whereby examinees who complete the LSAT under a disabilityrelated accommodation involving additional test time receive a notation on their score report indicating that their exam scores were earned under non-standard time conditions. When reporting these LSAT scores to the law schools, defendant advises the schools that these examinees' scores "should be interpreted with great sensitivity and flexibility."
- 56. In addition, scores from tests taken under extended time conditions are not averaged with other scores to produce a percentile ranking as are other test scores. Instead, extended time scores are reported individually.

John Doe

- 57. John Doe, a resident of Rancho Santa Fe (San Diego County), requested that defendant make accommodations for the December 2010 LSAT at Saddleback College.
- 58. Mr. Doe was diagnosed with attention deficit disorder (ADD) at age 13. In addition, in 2010 he became extremely ill with a bacterial infection and was hospitalized for approximately two



months, spending several weeks in the Intensive Care Unit in a medically-induced coma. During this illness he suffered a severe brain edema, which left him with residual neurological impairments.

- 59. Mr. Doe requested time and a half (150 percent) on the multiple choice and writing sections for the December 2010 LSAT.
- 60. In support of his request, Mr. Doe submitted medical documentation verifying his hospitalization, and a complete psychoeducational assessment, which reported multiple diagnoses: ADD, a learning disability (spelling), and a "[r]ecent bacterial infection with sustained induced coma and residual impairments."
- 61. LSAC refused to grant Mr. Doe's requested accommodation and instead asked for "a detailed explanation regarding the nature, severity, treatment, and extent of [his] disorder at the present time and it [sic] impact on your ability to take the LSAT."
- 62. Mr. Doe then submitted additional medical documentation indicating that he had "suffered a serious illness and developed marked weaknesses and encephalopathy. He continues to have fatigability and impaired concentration." His doctor recommended that Mr. Doe be granted increased time to complete the LSAT.
- 63. LSAC then demanded that Mr. Doe's psychologist provide "a current update of [his] cognitive status" before making a decision on his accommodation request.
- 64. Mr. Doe and his doctor disputed the need for an updated psychoeducational assessment just three months after the first report was completed. His doctor responded, "I would reiterate that Mr. Doe's intelligence is much as it was when he was originally seen (10/26/10) and with IQ scores as noted in that report, all within the average range with the exception of Processing Speed (4th percentile)."
- 65. LSAC granted Mr. Doe nine additional minutes for the multiple choice and writing sample sections (125 percent), with an additional 15 minutes of break time between sections three and four, for the February and June 2011 LSAT.

Jane Doe

- 66. Jane Doe, a resident of Oakland (Alameda County), requested that defendant provide her with reasonable accommodations on each of two administrations of the LSAT examination, one in February 2010 and a second in June 2010.
- 67. Ms. Doe has attention deficit disorder (ADD). Her condition makes it difficult to retain attention and focus, and significantly impairs her ability to conceptually organize and sequence abstract ideas.
- 68. Ms. Doe requested that LSAC accommodate her with time and a half (150 percent) on the multiple choice and writing sample sections of the LSAT.
- 69. In support of her request, Ms. Doe submitted medical documentation, verification that she had received the accommodation of time and a half (150 percent) as an undergraduate university student, and proof that she had received extended time (150 percent) on the Graduate Record Exam (GRE).
- 70. On January 15, 2010, LSAC denied Ms. Doe's accommodation requests, explaining that her documentation did not demonstrate that she had a disability, which affected her ability to take the LSAT.
- 71. Ms. Doe reapplied for accommodations on the June 2010 LSAT, requesting the same accommodation of time and a half (150 percent) on the multiple choice and writing sample sections.
- 72. LSAC also denied this request. When Ms. Doe asked for an explanation for the denial, defendant replied in writing that it was "not obligated to provide accommodations that are not warranted or supported by the documentation."

Peter Roe

- 73. Peter Roe, a resident of San Jose (Santa Clara County), requested that defendant make accommodations for the September 2009 LSAT at California State University, East Bay.
- 74. Mr. Roe has reading and math disorders, characterized by impaired auditory attention span and low visuomotor processing speed. These learning disorders substantially impact his ability to process written material, particularly under timed conditions.



- 75. Mr. Roe requested 20 extra minutes for the multiple choice sections and 30 extra minutes for the writing sample section of the LSAT. He also requested a reader and permission to use a computer dictation program.
- 76. In support of his request, Mr. Roe submitted a neuropsychological evaluation documenting his learning disabilities.
- 77. LSAC denied Mr. Roe any accommodation, noting that he had neglected to submit a "timed reading comprehension measure" in conformance with LSAC's guidelines, he had no history of educational accommodation, and his test results demonstrated an "average range of functioning."
- 78. Mr. Roe requested reconsideration of LSAC's denial, submitting the results of an additional reading comprehension test that documented Mr. Roe's reading problems and recommended that he receive an accommodation of time and a half (150 percent).
 - 79. After reconsideration, LSAC stood by its previous decision to deny accommodation.

Raymond Banks

- 80. Raymond Banks, a resident of San Francisco (County of San Francisco), requested that defendant make accommodations for the February 2011 LSAT at San Francisco State University.
- 81. Mr. Banks had a longstanding and severe injury to his shoulder muscle. As a result of this injury, Banks suffered from nerve damage, carpal tunnel syndrome, and chronic pain, all of which limited his ability to write.
- 82. Mr. Banks requested five additional minutes to complete each multiple-choice test section of the LSAT, 10 additional minutes on the writing sample section, five-minute breaks between each test section, a large table to write on, and permission to wear a splint on his wrist.
- 83. Real party Banks submitted medical documentation in support of his request, as well as proof that he had received accommodation as a student at the University of California, Berkeley for time and a half (150 percent) on all exams and quizzes.
- 84. LSAC denied all of Mr. Banks' requests, other than permitting him to wear a hand splint "as a courtesy." When Mr. Banks asked LSAC for an explanation of the denial, LSAC



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Kevin Collins

- 85. Kevin Collins, a resident of Woodland Hills (Los Angeles County), requested that defendant make accommodations for the February 2011 LSAT at California State University, Northridge.
- 86. Mr. Collins suffers from two learning disorders: disorder of written expression and a reading disorder. He has perceptual-organizational impairments, making it significantly more difficult for him to process simple or routine visual material without making errors, as compared to his peers.
- 87. Collins requested the accommodations of double time on multiple choice and writing sample sections of the LSAT, permission to use a computer and printer for the writing sample, and an alternative, non-Scantron answer sheet.
- 88. In support of his request, Collins submitted proof that he had received time and a half (150 percent) on the GRE and for exams at Claremont Graduate University. He also submitted a full psychoeducational assessment report as requested by LSAC's guidelines.
- 89. Defendant's first response was to ask for additional information and inform Collins that the deadline had passed for the February 2011 LSAT. Later, after Collins had submitted the requested information and requested consideration for the June exam, defendant granted him the accommodations of time and a half (150 percent) for the multiple choice and writing sample sections, rather than the double time that he had requested. The rest of his requested accommodations was granted.
- 90. Collins asked LSAC to reconsider its decision to deny him double time. LSAC stood by its previous decision that time and a half was appropriate.

Rodney DeComo-Schmitt

91. Rodney DeComo-Schmitt, a resident of Marin County, requested that defendant make accommodations for the October 2010 LSAT offered at Sonoma State University.

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	92.	Mr. DeComo-Schmitt suffers from a reading disorder, causing a significant
liscre	pancy l	between his verbal abilities and his visual-spatial abilities, especially under timed
condit	ions.	

- 93. Mr. DeComo-Schmitt requested time and a half (150 percent) on the multiple-choice sections of the exam, extra rest and break time, and permission to use a computer for the writing sample.
- 94. In support of his request, Mr. DeComo-Schmitt submitted a thorough psychoeducational assessment and proof that he had received time and a half (150 percent) on his SAT exam.
- 95. LSAC at first refused to consider Mr. DeComo-Schmitt's request for reconsideration, asserting that it had been submitted past the deadline for the October 2010 exam. Later, LSAC denied any accommodation to Mr. DeComo-Schmitt for the December 2010 exam, asserting that the documentation he had submitted did not demonstrate a limitation of a major life activity which affected his ability to take the LSAT.
- 96. Mr. DeComo-Schmitt requested reconsideration of LSAC's decision, submitting a letter from his psychologist contending that LSAC had misinterpreted the psychological testing.
- 97. LSAC stood by its denial of accommodation, informing Mr. DeComo-Schmitt that he was registered for the December 2010 LSAT as a standard test taker.

Andrew Grossman

- 98. Andrew Grossman, a Saratoga resident (Santa Clara County), requested that defendant make accommodations for the December 2010 LSAT offered at Santa Clara University.
- 99. As a child, Andrew Grossman was in a car accident and suffered a traumatic brain injury, which significantly impacted his cognitive abilities, memory, and attention. At the time that he applied for the LSAT, Andrew Grossman had been diagnosed with a reading disorder and a learning disorder (weak short-term auditory memory).

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•	100.	Andrew Grossman requested that defendant accommodate him by granting double
time o	n the n	nultiple choice and writing sample sections of the LSAT, and additional break and res
time.		

- In support of his request, Andrew Grossman submitted a complete psychoeducational assessment documenting his disability and need for accommodation, copies of an Individualized Educational Plan (TEP) from his high school showing that he had received extended time on tests, and proof that he had received accommodation for the SAT.
- 102. On October 18, 2012, LSAC notified Andrew Grossman that it would provide him with time and a half (150 percent) for the multiple choice and writing sample sections of the LSAT, instead of the double time that he had requested. LSAC did approve the extra rest and break time. explaining that it had fully considered the materials that Andrew Grossman had submitted, but "it is our judgment that the alternative accommodations you have been granted are appropriate and reasonable for your documented disability."
- With the assistance of his psychologist, Andrew Grossman asked LSAC to reconsider its decision to deny him double time. LSAC replied that it was too late to reconsider any decision related to the December 2010 test.

Elizabeth Hennessey-Severson

- 104. Elizabeth Hennessey-Severson, a resident of San Francisco (San Francisco County), requested that defendant make accommodations for the June 2011 LSAT at University of California, Hastings College of the Law.
- 105. Ms. Hennessey-Severson has reading, written expression and mathematics disorders. and ADHD. These conditions impair her working memory and her ability to plan, organize, and devote sustained attention to language-based tasks, particularly reading.
- Ms. Hennessey-Severson requested that LSAC accommodate her on the LSAT with a 106. minimum of time and a half (150 percent) extra testing time, and by allowing her short breaks of 10 to 15 minutes between sections of the exam.

- 107. In support of her request, Ms. Hennessey-Severson submitted psychoeducational assessment reports from 2002 and 2009. She also submitted proof that she had been accommodated with time and a half (150 percent) on the SAT, and while she was a student at Dartmouth College.
- Defendant denied all of Ms. Hennessey-Severson's requests for accommodation, contending that she scored in the "very superior" and "high average" range in her psychoeducational testing, and that her 2002 evaluation noted that she demonstrated a remarkable ability to compensate for her learning disabilities, such that she was able to take honors courses and play high school sports.
- Ms. Hennessey-Severson and her psychologist requested that LSAC reconsider its decision to deny accommodation. Her psychologist wrote: "It is my professional opinion based on all available evidence including comprehensive history, diagnostic interview, well established history of early diagnosis, remediation, and later accommodations throughout high school and college, that Ms. Hennessey has a standard learning disability that has a substantial impact on a major life function, namely, her ability to read, write, and calculate efficiently, and that extended time for formal testing is a reasonable accommodation for her disability."
- 110. After reconsideration, LSAC stood by its prior decision to deny Ms. Hennessey-Severson any accommodation.

Otilia Ioan

- 111. Otilia Ioan, a resident of San Jose (Santa Clara County), requested accommodation for the December 2010 LSAT offered at Santa Clara University.
- 112. Ms. Ioan is quadriplegic. She is paralyzed in all four limbs and is unable to physically write without using a brace.
- 113. Ms. Ioan requested that LSAC provide her with double time on all sections of the test, an alternate answer sheet, the use of a scribe, and an additional break of 30 minutes between sections 3 and 4 of the test.
- 114. In support of her request, Ms. Ioan submitted verification that she had received the accommodation of double time on tests while a student at De Anza College, and double time when taking the GRE.



- 115. LSAC asked Ms. Ioan to submit additional information from her doctor before it could consider her request for accommodation. LSAC wrote: "Your evaluator needs to provide detailed information regarding the nature, extent, severity, and treatment of your disorder and its functional limitation on your ability to take the LSAT," defendant wrote.
 - 116. Ms. Ioan's doctor supplied the additional information that LSAC requested.
- 117. Ms. Ioan wrote to LSAC requesting reconsideration of its decision to deny her double testing time. LSAC stood by its previous decision.

Alex Johnson

- 118. Alex Johnson, a resident of Lake San Marcos (San Diego County), requested accommodations for the October 2010 LSAT offered at the University of Southern California.
- 119. Mr. Johnson is quadriplegic. He is unable to write or turn pages because his fingers are paralyzed. He is unable to draw diagrams, underline text, or use a standard Scantron answer sheet.
- 120. Mr. Johnson requested 15 minutes of extra break time between each section of the LSAT, and 120 additional minutes (more than triple time) on the multiple choice and writing sample sections.
- 121. In support of his request, Mr. Johnson submitted medical documentation of his condition and need for accommodation, as well as verification from the University of Southern California that he had received double time on his exams while a student there.
- 122. At first, LSAC refused to consider Mr. Johnson's accommodation request, because he was not registered to take the LSAT. Later, it granted Mr. Johnson time and a half (150 percent) on the multiple choice and writing sample sections, and 10 minutes of break time between each section. It agreed to provide Mr. Johnson with a scribe, and permitted him to use a computer for the writing sample.
- 123. Mr. Johnson requested that LSAC reconsider his request for double time. His doctor wrote, "Double time is the least amount of time I should be allocated. It is also very hard to use a scribe because of time limitations."



124. LSAC responded that it did not offer an untimed test, and that the documentation submitted did not support Johnson's request.

Nicholas Jones

- 125. Nicholas Jones, a resident of Palm Desert (Riverside County), requested that defendant provide him with an accommodation for the December 2009 LSAT offered at the University of Laverne (Ontario).
- 126. Mr. Jones suffers from two distinct eye conditions. First, he has amblyopia or "lazy eye" in his left eye, which impairs his visual processing. Second, he has posterior vitreous detachments in his right eye, meaning that he has persistent floaters or spots, which obstruct his field of vision. These conditions together impair Mr. Jones' reading speed and ability.
- 127. Mr. Jones requested time and a half (150 percent) on the multiple choice and writing sample sections of the exam and five-minute breaks between each section.
- 128. In support of his request, Mr. Jones submitted medical forms filled out by his doctor, an eye specialist.
- 129. LSAC refused to provide any accommodation to Mr. Jones, informing him that "[t]he documentation provided did not reflect an impairment related to taking the Law School Admission Test."
- 130. Mr. Jones requested that LSAC reconsider its decision denying him accommodations, and asked it to provide further explanation. Mr. Jones' doctor wrote a letter supporting his request for reconsideration, asserting that Jones' eye condition "substantially limits him in at least one major life activity, reading."
 - 131. After reconsideration, defendant stood by its prior decision to deny accommodation.



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Caroline Lee

- 132. Caröline Lee, a resident of Oakland (Alameda County), requested that defendant make accommodations for the December 2010 LSAT offered in the City of Oakland.
- 133. Ms. Lee suffers from ADHD and a reading disorder, causing her reading to be labored and excessively slow, and impairing her short-term memory.
- 134. Ms. Lee requested time and a half (150 percent) on the LSAT multiple choice and writing sample, as well as extended breaks during the exam, a quiet testing environment, and the use of a laptop to compose all written work.
- 135. In support of her request, Ms. Lee submitted proof that she had received extended testing time of 150 percent while a student at City College of San Francisco (CCSF) and that she had taken the SAT and ACT with accommodations. She also submitted a psychoeducational assessment that had been performed while she was a student at CCSF.
- 136. LSAC replied in writing to Ms. Lee that she needed to submit additional documentation in order for her request to be considered, asking for: "[t]esting results and a full diagnostic report from a comprehensive up-to-date psychoeducational/neuropsychological assessment that comply with the Law School Admissions Council, Inc. Guidelines for Documentation of Cognitive Impairments."
- 137. Ms. Lee then obtained and submitted a full psychoeducational evaluation in February 2011, which documented her ADHD and reading disorder. Her psychologist recommended that she receive 150 percent extended time, as well as the other previously requested accommodations.
- 138. LSAC then requested that Ms. Lee submit several additional documents and reports. Ms. Lee did so.
- 139. In April 2011, defendant denied all of Ms. Lee's requested accommodations, informing her that: her performance on academic measures was commensurate with her ability, negating a finding of impairment; her documentation failed to support the diagnosis of an attention disorder; and her request for additional time on the writing sample was not considered because her psychologist had not administered the right tests.

- 140. Ms. Lee requested that LSAC reconsider its denial of accommodation. This request was accompanied by a letter from her psychologist, who contended that LSAC had misinterpreted the psychoeducational assessment.
 - 141. After reconsideration, LSAC stood by its initial decision to deny accommodations.

Andrew Quan

- 142. Andrew Quan, a resident of Hayward (Alameda County), requested accommodation for the October 2011 LSAT offered at the University of California, Santa Cruz.
- 143. Mr. Quan has ADHD, a visual-motor integration deficit with slow processing speed, hypotonia, and dysgraphia.
- 144. Mr. Quan requested that LSAC provide him with the accommodations of double time on the multiple choice and writing sample portions of the exam, 10-minute breaks between each section of the test, and the use of a computer for the writing sample.
- 145. In support of his request, Mr. Quan submitted to LSAC proof that he had been accommodated with the use of a computer on his ACT exams. He also submitted a 2008 psychoeducational assessment from high school, showing that Mr. Quan suffered from "significant deficits in visual-motor integration and fine motor skills." Included within that assessment was a 2008 IEP documenting dysgraphia, attention deficit, visual processing, and sensory motor skills disorders which qualified him for special educational services, the use of a laptop computer, a scribe, and extra examination time.
- 146. LSAC requested that Mr. Quan provide further documentation to support his request, including "testing results and a full diagnostic report from a comprehensive up-to-date psychoeducational/neuropsychological assessment that comply with [LSAC Guidelines]."
- 147. Mr. Quan contested LSAC's need for additional documentation, asserting that it was unnecessary, unaffordable, and burdensome.
- 148. LSAC responded that if Mr. Quan wanted any accommodation in the future, he would need to submit "substantive documentation to support your request for your hypotonia/dysgraphia disorders."



Stephen Semos

- 149. Stephen Semos, a resident of Rancho Palos Verdes (Los Angeles County), requested that defendant make accommodations for the December 2010 LSAT at Whittier Law School (Costa Mesa).
- 150. Mr. Semos has ADHD and dsygraphia, which significantly impair his reading, writing, organization, and general academic performance.
- 151. Mr. Semos requested time and a half (150 percent) on both the multiple-choice and writing sample portions of the exam, additional break time of five to eight minutes.
- 152. In support of his request, Mr. Semos submitted proof that he had received: accommodations on the SAT; an IEP from the Palos Verdes Peninsula Unified School District identifying Mr. Semos as learning disabled; a letter verifying that he had received accommodations while a student at the University of California, Irvine, of time and a half (150 percent) on tests; and a complete psychoeducational assessment by his doctor, a neuropsychologist.
- 153. LSAC's first response was to ask Mr. Semos to provide additional documentation in order to consider his accommodation request, including a full report of two particular tests for cognitive disabilities, the Nelson-Denny Reading Test (NDRT) and the Conner's Continuous Performance Test-II. LSAC also informed Mr. Semos that the deadline for the December 2010 LSAT had passed, but that he could request accommodation for future exams.
 - 154. Mr. Semos then submitted his documentation for the February 2011 LSAT.
- 155. In response, LSAC denied all of Mr. Semos' requests for accommodation on the basis that his test scores were generally commensurate with his abilities and thus did not demonstrate a learning disability.
- 156. Mr. Semos' neuropsychologist requested that LSAC reconsider its denial. Mr. Semos' doctor wrote: "Your denial letter written to Mr. Semos selectively highlighted the above average scores and thereby masked the patterns of deficits in processing speed and fine motor speed noted in my neuropsychological report."

157. LSAC responded that the letter from Mr. Semos' neuropsychologist had arrived too late to be considered for the February 2011 LSAT. LSAC wrote: "You remain registered to test as a standard test taker. No accommodations have been granted."

Gazelle Taleshpour

- 158. Gazelle Taleshpour, a resident of San Diego (San Diego County), requested that defendant make accommodations for the October 2010 LSAT offered at the University of San Diego.
- 159. Ms. Taleshpour has ADHD. She also suffers from osteopenia (bone loss) and chronic pain in her neck and back as a result of treatment she had received for leukemia, a bone marrow transplant, radiation, and chemotherapy.
- 160. Ms. Taleshpour requested that LSAC accommodate her with 30 extra minutes on the multiple choice and writing sample portions of the exam, breaks of two to five minutes every half hour so that she could stretch and alleviate pain, a high table, and a comfortable chair.
- 161. In support of her request, Ms. Taleshpour submitted documentation from her treating medical doctor, her chiropractor, and her psychologist. She also provided LSAC with verification that she had received time and a half (150 percent) on all tests and exams while a student at the University of San Diego.
- 162. LSAC requested that Ms. Taleshpour provide additional documentation in support of her accommodation request, including "[t]esting results and a full diagnostic report from a psychoeducational/neuropsychological assessment that comply with Guidelines for Documentation of Cognitive Impairments."
- 163. Ms. Taleshpour obtained and submitted the additional documentation that LSAC requested. Her psychiatrist performed a full psychoeducational assessment, which diagnosed her with ADHD, a reading disorder, and a learning disability (dyslexia). Her psychiatrist supported Ms. Taleshpour's request for double time and other accommodations.
- 164. LSAC only partially granted Ms. Taleshpour's request for accommodation, allowing her to sit or stand at a podium while taking the exam, and to bring a seat cushion or an adjustable chair.



- LSAT: double time on multiple choice and writing sample; an alternate, non-Scantron answer sheet; use of a reader; an additional 15 minutes of rest time; and 15-minute breaks between sections.
- 166. LSAC denied the request for additional accommodations beyond the two it had already granted, explaining to Ms. Taleshpour that her intelligence test scores were average and commensurate with her ability, meaning that no cognitive disability was apparent.
- 167. Ms. Taleshpour requested that LSAC reconsider its denial of accommodation for extratime. Her psychologist supported the reconsideration request, contending that LSAC failed to recognize significant discrepancies in her reading speed and comprehension. "These significant difficulties provide psychometric evidence of the presence of a Learning Disability as described by the ADA," he wrote.
- 168. LSAC stood by its prior decision to limit the accommodations made for Ms.

 Taleshpour: permission to sit or stand with a podium and to bring a seat cushion or an adjustable chair.

Kevin Vielbaum

- 169. Kevin Vielbaum, a resident of San Mateo (San Mateo County), requested that defendant make accommodations for him in taking the June 2011 LSAT at the University of California, Hastings College of the Law.
- 170. Mr. Vielbaum has a reading disorder (dyslexia), characterized by a significant difficulties with perceptual reasoning, working memory, and cognitive processing speed.
- 171. Mr. Vielbaum requested that defendant accommodate him with time and a half (150 percent) on the multiple choice section of the LSAT, double time on the writing sample, and permission to use a computer for the writing sample.
- 172. In support of his request, Mr. Vielbaum submitted extensive records from his primary education at a special school for students with dyslexia, where he was granted accommodations of extended time and the use of a laptop and calculator.



LSAC granted Mr. Vielbaum only the accommodation of using a computer, printer and spell check for the writing sample. LSAC denied the accommodation of extra time, noting that Mr. Vielbaum had not requested accommodation on the SAT, and that he had scored well on the tests involved in his psychoeducational assessment. Defendant went on to explain that: "[y]our evaluator notes you have difficulties with logical reasoning. Inasmuch as the Law School Admission Test is designed to measure these skills, the accommodations requested (extended time on all examinations that involve the solving of logic problems), would not be appropriate."

Austin Whitney

- 174. Austin Whitney, a resident of Contra Costa County, first requested accommodations for the September 2009 LSAT offered at San Diego State University.
 - 175. Mr. Whitney is paraplegic due to a spinal cord injury in 2007.
- 176. Mr. Whitney requested that defendant accommodate his disability with time and a half (150 percent) on the multiple choice and writing sample sections of the LSAT, and a wheelchair accessible testing location.
- 177. In support of his request, Mr. Whitney submitted medical records pertaining to his 2007 injury, verification from the University of California at Berkeley that he had received time and a half (150 percent) for all exams and quizzes during his undergraduate studies, and a form filled out by his doctor indicating that, because of his injury and surgeries, he suffered from "severe chronic pain and radiating radicular nerve pain" for which Whitney took prescription medication that caused drowsiness.
- 178. LSAC responded that Mr. Whitney's request for accommodation had been submitted too late for the September 2009 test, and therefore he was registered as a standard test taker.
- 179. Mr. Whitney next requested accommodations for the June 2010 LSAT offered in Berkeley at the California Ballroom. This time he requested that LSAC accommodate him with five-minute breaks between sections, in addition to providing time and a half (150 percent) on the multiple choice and writing sample sections and a wheelchair accessible testing site.



180. In support of this request, Mr. Whitney submitted medical forms from four different
doctors, each of whom supported his need for extra testing time. Dr. Larry Snyder explained:
"Patient has significant fatigue due to medications taken for previous spinal injury - this will affect
his performance in TIMED conditions." Dr. Carol Jessop wrote that, due to Mr. Whitney's spinal
cord injury with chronic, nueropathic pain, he needed extra time to compensate for the effects of the
pain medication which cause fatigue. Dr. Jessop explained: "This is a significant problem for Austin
Whitney as he is taking medications that cause him to be sleepy and fatigued. This drowsiness
makes him slower in his response to test questions. If an exam has a time limit, he will definitely
need extra time to complete it."

- 181. LSAC then granted Mr. Whitney the extra break time that he requested, and agreed to provide a wheelchair accessible testing site, but denied his request for extra testing time. "If you choose to have your cognitive disorder (alluded to by Carol Jessop, MD) considered," defendant wrote, "you must provide a current psychoeducational/neuropsychological assessment or neuropsychological evaluation as per our Guidelines for Documentation of Cognitive Impairments."
- 182. Mr. Whitney asked defendant to reconsider its decision to deny additional testing time, and three of his doctors wrote to LSAC in support of his request.
- a. Dr. Snyder wrote, "His pain and spacticity are a constant distraction and put him at a significant disadvantage as a test taker. In addition, the medication he is taking causes significant fatigue and makes it difficult to concentrate. The medication side effects do not impair cognition but can slow processing speed. For these reasons, he should be afforded extra time when taking this standardized test."
- b. Dr. Jessop wrote, "I would like to emphasize that the nature of Mr. Whitney's condition is physiological (pain issues) and NOT cognitive or due to a learning disorder. Our request for extra time on the exam is based solely on physiological effects of chronic, severe neuropathic pain, and the fatiguing side effects of pharmaceutical pain killers. Thus, because he doesn't have a learning disability, I feel strongly that neuropsychological or psychoeducational testing would be irrelevant in his case,"



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c. Dr	. Hedelman wrote, "Patient's significant impacts on concentration, reading
writing, ability to attend	class is secondary to his unpredictable, severe neuropathic pain and the
associated pain managen	nent medications. Patient does not have an underlying cognitive impairmen
requiring neuropsych[old	egical] testing."

- 183. LSAC refused to reconsider its decision, responding: "We have no objective evidence to support Dr. Carol Jessop, MD's conclusion that your thought processes are not as fast as they could be without medication."
- 184. In 2011, at LSAC's behest, Mr. Whitney was evaluated by a psychologist, who determined that he required double time on examinations due to the effect that his pain medication was having on his cognitive abilities.
- 185. In response to a second accommodation request by Mr. Whitney with the psychologist's report as supporting documentation, LSAC awarded him 10 additional minutes on each section of the exam. LSAC provided no rationale for denying his request for double time.

FIRST CLASS CAUSE OF ACTION

Unlawful Consideration of Mitigation Measures

 $(42 \text{ U.S.C.} \S 12102(4)(E)(I)(i)(I))$

- 186. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 186, inclusive, as if fully set forth herein.
- 187. The ADA, 42 U.S.C. § 12102(4)(E)(1)(i)(I), requires that "any determination of whether an impairment substantially limits a major life activity shall be made without regard to the ameliorative effects of mitigating measures such as medication." The ADA is incorporated into the Unruh Act by Civil Code section 51, subdivision (f).
- 188. By requiring applicants to take the medication prescribed for their disabilities while being evaluated for accommodations or explain their failure or refusal to do so, LSAC violates the rights of class members under the FEHA, Unruh Act, and ADA,



	1.69,	As a direct result of the unlawful practices of defendants as alleged herein, class
nembe	ers have	ncurred out of pocket losses, including test registration fees and medical bills, in a
amoun	t to be p	oven at trial.

- 190. As a further and direct result of the unlawful practices of defendants as alleged herein, class members have suffered emotional distress, anxiety, lost opportunity, frustration, humiliation, and loss of dignity and self-esteem, in an amount to be proven at trial.
- demonstrated that they will continue to engage in, the pattern and practice of unlawful discrimination described herein unless and until they are enjoined, pursuant to the police power granted by Government Code sections 12920 and 12920.5, and pursuant to section 12974, from failing or refusing to comply with the mandates of the FEHA, Unruh Act, and the ADA. Unless and until defendants are enjoined from failing or refusing to comply with the mandates of these laws, class members' right to full and equal access to places of public accommodation will continue to be violated. Plaintiff lacks any plain, speedy, adequate remedy at law to prevent such harm, injury and loss, which will continue until the court enjoins the complained of unlawful conduct and grants other affirmative relief as prayed for herein.

SECOND CLASS CAUSE OF ACTION

Failure to Ensure that Exam Measures Ability Rather than Disability (42 U.S.C. § 12189 and 28 C.F.R. § 36.309)

- 192. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 186, inclusive, as if fully set forth herein.
- 193. The ADA requires that any person offering examinations related to post-secondary education or profession "shall offer such examinations or courses in a place and manner accessible to persons with disabilities." (42 U.S.C. § 12189.) Regulations interpreting this section impose an obligation on the entity offering such an examination that "[t]he examination is selected and administered so as to best ensure that, when the examination is administered to an individual with a disability that impairs sensory, manual, or speaking skills, the examination results accurately reflect

the individual's aptitude or achievement level or whatever other factor the examination purports to measure, rather than reflecting the individual's impaired sensory, manual, or speaking skills." (28 C.F.R. § 36.309.)

- 194. By adhering to a blanket policy of annotating scores taken under extended time conditions, defendant is communicating to law schools that it does not know whether or not the applicants' exam results accurately reflect aptitude or achievement. Therefore, LSAC is breaching its duty under the FEHA, Unruh Act, and ADA to ensure that the examination results accurately reflect the individual's aptitude or achievement level. (28 C.F.R. § 36.309(b)(1)(i).)
- 195. As a direct result of the unlawful practices of defendants as alleged herein, class members have incurred out of pocket losses, including test registration fees and medical bills, in an amount to be proven at trial.
- 196. As a further and direct result of the unlawful practices of defendants as alleged herein, class members have suffered emotional distress, anxiety, lost opportunity, frustration, humiliation, and loss of dignity and self-esteem, in an amount to be proven at trial.
- demonstrated that they will continue to engage in, the pattern and practice of unlawful discrimination described herein unless and until they are enjoined, pursuant to the police power granted by Government Code sections 12920 and 12920.5, and pursuant to section 12974, from failing or refusing to comply with the mandates of the FEHA, Unruh Act, and the ADA. Unless and until defendants are enjoined from failing or refusing to comply with the mandates of these laws, class members' right to full and equal access to places of public accommodation will continue to be violated. Plaintiff lacks any plain, speedy, adequate remedy at law to prevent such harm, injury and loss, which will continue until the court enjoins the complained of unlawful conduct and grants other affirmative relief as prayed for herein.

THIRD CLASS CAUSE OF ACTION

Coercion, Intimidation, Threats, or Interference with ADA Rights - Flagging (42 U.S.C. § 12203)

- 198. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 186, inclusive, as if fully set forth herein.
- 199. The ADA makes it unlawful to "coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, any right granted or protected by this Act." (42 U.S.C. § 12203.)
- 200. LSAC's policy of annotating tests scores administered under extended time conditions discourages applicants from seeking such an accommodation, and punishes those who receive it, in violation of the FEHA, Unruh Act, and ADA.
- 201. As a direct result of the unlawful practices of defendants as alleged herein, class members have incurred out of pocket losses, including test registration fees and medical bills, in an amount to be proven at trial.
- 202. As a further and direct result of the unlawful practices of defendants as alleged herein, class members have suffered emotional distress, anxiety, lost opportunity, frustration, humiliation, and loss of dignity and self-esteem, in an amount to be proven at trial.
- 203. Defendants have engaged in, and by their refusal to comply with the law, have demonstrated that they will continue to engage in, the pattern and practice of unlawful discrimination described herein unless and until they are enjoined, pursuant to the police power granted by Government Code sections 12920 and 12920.5, and pursuant to section 12974, from failing or refusing to comply with the mandates of the FEHA, Unruh Act, and the ADA. Unless and until defendants are enjoined from failing or refusing to comply with the mandates of these laws, class members' right to full and equal access to places of public accommodation will continue to be violated. Plaintiff lacks any plain, speedy, adequate remedy at law to prevent such harm, injury and loss, which will continue until the court enjoins the complained of unlawful conduct and grants other affirmative relief as prayed for herein.

FOURTH CAUSE OF ACTION - REAL PARTIES IN INTEREST ONLY

Denial of Reasonable Accommodation

(42 U.S.C. § 12189 and 28 C.F.R. § 36.309(b)(1)(iv))

- 204. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 186, inclusive, as if fully set forth herein.
- 205. The ADA requires that any person offering examinations related to post-secondary education or profession "shall offer such examinations or courses in a place and manner accessible to persons with disabilities." (42 U.S.C. § 12189.) As part of this duty to make an examination accessible, the regulations require that any documentation requested be "reasonable and limited to the need for the modification, accommodation, or auxiliary aid or service requested." (28 C.F.R. § 36.309(b)(1)(iv).)
- 206. LSAC breached its duty to make the LSAT accessible to people with disabilities by requiring excessive amounts of documentation and denying a reasonable accommodation to each real party in interest, in violation of the FEHA, Unruh Act, and ADA.
- 207. As a direct result of the unlawful practices of defendants as alleged herein, real parties have incurred out of pocket losses, including test registration fees and medical bills, in an amount to be proven at trial.
- 208. As a further and direct result of the unlawful practices of defendants as alleged herein, real parties have suffered emotional distress, anxiety, lost opportunity, frustration, humiliation, and loss of dignity and self-esteem, in an amount to be proven at trial.
- 209. Defendants have engaged in, and by their refusal to comply with the law, have demonstrated that they will continue to engage in, the pattern and practice of unlawful discrimination described herein unless and until they are enjoined, pursuant to the police power granted by sections 12920 and 12920.5, and pursuant to section 12974, from failing or refusing to comply with the mandates of the FEHA, Unruh Act, and the ADA. Unless and until defendants are enjoined from failing or refusing to comply with the mandates of these laws, class members' right to full and equal access to places of public accommodation will continue to be violated. Plaintiff lacks any plain,

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speedy, adequate remedy at law to prevent such harm, injury and loss, which will continue until the court enjoins the complained of unlawful conduct and grants other affirmative relief as prayed for herein.

FIFTH CAUSE OF ACTION - REAL PARTIES IN INTEREST ONLY

Coercion, Intimidation, Threats, or Interference with ADA Rights

(42 U.S.C. § 12203)

- 210. The DFEH realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 186, inclusive, as if fully set forth herein.
- 211. The ADA makes it unlawful to "coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, any right granted or protected by this Act." (42 U.S.C. § 12203.)
- 212. LSAC's policies and patterns of requiring unreasonable types and excessive amounts of documentation to support each accommodation request violate the FEHA, Unruh Act, and the ADA, by unlawfully coercing, intimidating, threatening, or interfering with real parties' exercise or enjoyment of their right to reasonable accommodation on the LSAT.
- As a direct result of the unlawful practices of defendants as alleged herein, real parties have incurred out of pocket losses, including test registration fees and medical bills, in an amount to be proven at trial.
- 214. As a further and direct result of the unlawful practices of defendants as alleged herein, real parties have suffered emotional distress, anxiety, lost opportunity, frustration, humiliation, and loss of dignity and self-esteem, in an amount to be proven at trial.
- 215. Defendants have engaged in, and by their refusal to comply with the law, have demonstrated that they will continue to engage in, the pattern and practice of unlawful discrimination described herein unless and until they are enjoined, pursuant to the police power granted by Government Code sections 12920 and 12920.5, and pursuant to section 12974, from failing or refusing to comply with the mandates of the FEHA, Unruh Act, and the ADA. Unless and until defendants are enjoined from failing or refusing to comply with the mandates of these laws, class



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GOURT PAPER State of California Std. 113 Rev. 3-95 FE&H Automated members' right to full and equal access to places of public accommodation will continue to be violated. Plaintiff lacks any plain, speedy, adequate remedy at law to prevent such harm, injury and loss, which will continue until the court enjoins the complained of unlawful conduct and grants other affirmative relief as prayed for herein.

PRAYER FOR RELIEF

WHEREFORE, the DFEH prays that the court issue a judgment in favor of the DFEH, real parties in interest, and members of the class, and order defendants to provide the following relief:

AS TO REAL PARTIES IN INTEREST

- 216. Provide free and accommodated testing at the next available testing date in each real party's area, with accommodations as initially requested by that real party;
- 217. Provide a letter to each real party explaining that their LSAT scores used for their law school applications during the relevant period may not have provided accurate measures of their acquired reading and verbal reasoning skills, because LSAC did not reasonably accommodate their disabilities.

AS TO ALL MEMBERS OF THE CLASS, INCLUDING THE REAL PARTIES IN INTEREST

- 218. Cease and desist from consideration of mitigation measures such as medication when making a determination as to whether an applicant needs an accommodation.
- 219. Cease and desist from specially annotating LSAT scores tests scores administered under extended time conditions.
- 220. Include all test scores in the percentile ranking process and provide a ranked percentile to each test taker.
- 221. Immediately undertake a validation study to determine if LSAC scores under accommodation of extra time for cognitive disabilities are an equal measure of aptitude or achievement as compared to non-accommodated scores.
- 222. Reduce to a discrete and reasonable amount the documentation required to verify an applicant's need for an accommodation, especially for so-called cognitive disabilities, consistent with

the ADA's requirement that such documentation be "reasonable" and Congress' mandate that "the
question of whether an individual's impairment is a disability under the ADA should not demand
extensive analysis," (28 C.F.R. § 36.309(b)(1)(iv); 42 U.S.C. § 1201 [Pub. L. No. 110-325, § 2(b)(5)
(Sept. 25, 2008) 122 Stat. 3553].)

- 223. Create a more streamlined and user-friendly process for considering reasonable accommodation requests, that includes notice to applicants, within a reasonable period of time, whether or not requested accommodations have been granted, and provides a fair process for timely reconsideration of any denial of requested accommodations.
- 224. Pay actual damages according to proof for each Unruh Act violation up to a maximum of three times the actual damages but in no case less than \$4,000 per violation.
- 225. Provide written proof to the Department of the nature and extent of LSAC's compliance with all requirements of the court's order within 100 days of its effective date; and,
 - 226. Provide such other relief as the Court deems to be just and proper.

Dated: March 15, 2012

Deem filed Feb. 6, 2013

per Court order

DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

Jon M. Ichinaga Chief Counsel

R. Sybil Villanueva Associate Chief Counsel

Phoebe P. Liu Senior Staff Counsel

Mari Mayeda Senior Staff Counsel

By:/s/

R. Sybil Villanueva Attorneys for the Department



Case 3:12-cv-01830-JCS Document 104 Filed 02/07/13 Page 38 of 77

* * * PUBLIC ACCOMMO THON/RALPH/CIVIL CODE S TIONS 51.5 & 64 * * *

COMPLAINT OF DISCRIMINATION UNDER THE	DFEH # <u>0200910-Q-</u>	0003_00
PROVISIONS OF THE CALIFORNIA FAIR EMPLOYN	ENT	
AND HOUSING ACT WHICH INCORPORATES THE I RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT AND	JIVRUM CIVIL TIVII COME SECTIONIS ET E AND ET	
COMPLAINANT'S NAME(S) (indicate Mr. or Ms., if individual)	Sivil SOUL SECTIONS 31.3 RND 34	-
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ADORESS	TELEPHONE NUMBI	ER (INCLUDE AREA CODE)
	COUNTY	COURTY CODE
The state of the s	Alameda	001
NAMED IS THE PERSON, BUSINESS ESTABLISHMENT	r, PUBLIC ACCOMMODATION OR OTHER	RENTITY THAT
DISCRIMINATED AGAINST ME:		
NAME(S))	
LAW SCHOOL ADMISSIONS COUNCIL	YELEPHONE NUMBI	R (INCLUDE AREA CODE)
P.O. Box 8512	/2	181 080 1001
CITY/STATE/ZIP	COUNTY	10) 900-1001 10, 44 ACOUNTY CODE 000
Newtown, PA 18940 CAUSE OF DISCRIMINATION BASED ON ICHECK APPROPRIATE BOX		
D RACE DSEX DISABILITY D RELIGIO	N D NATIONAL ORIGIN/ANCESTRY (SPECIFY)	SEXUAL ORIENTATION
DI COLOR DI AGE DI MARITAL STATUS DI OTHER		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) April 21, 2010	1	В
THE PARTICULARS ARE:		
I. On or about April 21, 2010, I was denied my	reasonable accommodation request	for 50% extra testing
time when taking my LSAT exam for the Law	School Admissions Council which is	located at P.O. Box
8512, Newtown, PA 18940.		
II. I believe I was denied my reasonable accomm	modetion request for EANA outra tactic	za timo uman takina
my LSAT exam which is necessary due to my	disability (Attention Deficit Disorder	ig time when taking I which is a violation
Government Code, Section 12948. The Gov	ernment Code incorporates Section	51 of the Civil Code.
My belief is based on the following:	`	
		_
A. Corporate Council, Joan Van Tol, was	aware of my disability and the granti	ng of my
accommodation request for 50% addit requested an accommodation for 50%	additional testing time for the time t	. nowever, alter (
request was denied.	. additional county into 101 the cartes	if more morning they
/ / / / / / / / / / / / / / / / / / /		
Typed and mailed for signature on May 4, 2010.	;	
I dealers under penalty of negitive under the laws of the State	of California that the foregoing is true and cor	rect of my own
knowledge except as to matters stated on my information an	d hellef, and as to those matters I believe it to	be true.
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Dated 11100 11700	SIGNATUREL	
Making	MAY 0 9 2010	The state of the s
At A Jakiana		Service of the servic
City	COMPLAINANT'S SIGNATURE/GUARDIANM HOUSING-OAKLAND HOUSING	AD LITEM
DFEH-300-02 (12/99) Q:DS:bps	DATE FILED:	U(V()
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING		STATE OF CALIFO

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ATION/RALPH/CIVIL CODE CTIONS 51.5 & 54 * * * PUBLIC ACCOMM

COMPLAINT OF DISCRIMINATION UNDER THE

CUMPLAINT OF DISCRIMINATION UNDER TH		E-200910-G-0012-00-p
PROVISIONS OF THE CALIFORNIA FAIR EMPI	LUTIVICIVI	The state of the s
AND HOUSING ACT WHICH INCORPORATES	THE UNRUH CIVIL	
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT	AND GIVIL CODE SECTIONS	51.5 AND 54
COMPLAINANT'S NAME(S) (indicate Mr. or Ms., it individual) Jones, Nicholas E. (Mr)		
ADDRESS		
73213 Catalina Way	•	TELEPHONE NUMBER (INCLUDE AREA CODE)
CITY/STATE/ZIP		(760) 409-9103
	COUNTY	COUNTY CODE
Palm Desert, ca 92260	Riverside	065
NAMED IS THE PERSON, BUSINESS ESTABLISH	MENT, PUBLIC ACCOMMODAT	TON OR OTHER ENTITY THAT
DISCRIMINATED AGAINST ME:		
NAME(S)		The state of the s
Law School Admissions Council, Inc. (LSA	(C)	
ADDRESS		ELEPHONE NUMBER (INCLUDE AREA CODE)
Post Office Box 8512		215-968-1001
CITY/STATE/7.IP	COUNTY	COUNTY CODE
Newton, PA 18940-8512	Out-of-State	000
CAUSE OF DISCRIMINATION BASED ON (CHECK APPROPRIAT		The strategy of the strategy o
DOOLOR DAGE CIMARITAL STATUS DO	I <mark>ELIGION — CI NATIONAL ORIGIN</mark> DTHER (SPECIFY)	/ANCESTRY D SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION	the Management of the Control of the	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) December 5, 20	009	8
FHE PARTICULARS ARE:		and the state of t

- I. On or about December 5, 2009 I was denied reasonable accommodation to take the LSAT test for the Law School Admissions Council.
- II. On or about October 27, 2009 and November 9, 2009 I received notification my request for reasonable accommodation had been denied.
- III. I believe I was denied reasonable accommodation because of my disabilities (Amblyopia/Posterior Vitreous Detachment) and because of my membership in a class of people who are disabled. This is a violation of Section 12948 of the Government Code. The Government Code incorporates Section 51 of the Civil Code. My belief is based on the following:
 - A. On or about October 20, 2009 I requested a reasonable accommodation to take the LSAT test scheduled for December 5, 2009.
 - B. On or about October 27, 2009 I received notification the documentation I provided did not reflect an impairment related to taking the LSAT and I remained registered to test as a standard test taker.
 - C. On or about November 3, 2009 I requested reconsideration regarding my accommodation request by providing additional information requested by LSAC to justify my need for reasonable accommodation.

* * * PUBLIC ACCOMN. DATION/RALPH/GIVIL CODE GCTION 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT	DFEH # <u>U-200910-G-0012-00-p</u>
AND HOUSING ACT WHICH INCORPORATES THE UNRUH CIVIL RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT AND CIVIL CODE SEC	TIONS 51.5 AND 54
COMPLAINANT	The second secon
Jones, Nichalas E. (Mr.)	
RESPONDENT	The second secon
Law School Admissions Council, Inc. (LSAC)	•
THE PARTICULARS ARE:	

- D. On or about November 9, 2009 I received notification the additional documentation was reviewed and there was no change in their decision and my request for reasonable accommodation was denied.
- IV. I am making this complaint on behalf of myself and all other disabled individuals, who have been, are now, or will in the future be similarly aggrieved.

Pg. 2 of 2

RECEIVED

Typed and mailed for	r signature on January 11, 2010/AN 2 1 2010
I declare under penalty of perjury under the laws of the Stat except as to matters stated on my information and belief, a	te of California that the foregoing is true and correct of my own knowledge nd as to those matters I believe it to be 1768 to the control of
Dated //14/206	NU CHOCKS F. JONES COMPLAINANT'S SIGNATURE
AT PALM DESENT, CA	COMPLAINANT'S SIGNATURE/GUARDIAN AD LITEM
DEEH-300-02 (12/99) SJ: AL: 80 DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING:	DATE FILED: JAN 2 1 2018 STATE OF CALIFORNIA

SUSAN SAYLOR (#154592) ĭ Acting Chief Counsel ALEXANDRA SELDIN (#239708) 2 Staff Counsel DEPARTMENT OF FAIR EMPLOYMENT Š AND HOUSING 2218 Kausen Drive, Suite 100 4 Elk Grove, CA 95758 Telephone No.: (619) 645-2575 5 Facsimile: (619) 645-3170 6 Attorneys for the Department 7 8 BEFORE THE FAIR EMPLOYMENT AND HOUSING COMMISSION 9 OF THE STATE OF CALIFORNIA 10 11 In the Matter of the Complaint of Case Nos. U-200910-G-0012-00-p THE DEPARTMENT OF FAIR U-200910-G-0011-00-p 12 EMPLOYMENT AND HOUSING. U-200910-Q0003-00 13 VS: NOTICE OF CLASS ACTION 14 LAW SCHOOL ADMISSION COUNCIL. COMPLAINT AND DIRECTOR'S INC., COMPLAINT 15 Respondent, (Gov. Code §§ 12960, 12961 and 12965, 16 subd. (a),) 17 HAMID MICHAEL HEJAZI; NICHOLAS E. JONES; and 18 Complainants. 19 20 21 TO LAW SCHOOL ADMISSION COUNCIL, INC., 662 Penn Street, Box 40, Newton, 22 Pennsylvania, 18940: 23 PLEASE TAKE NOTICE that pursuant to Government Code sections 12960 and 12961, the 24 Director of the DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING (hereinafter "the 25 Department") has determined that the cases listed below will be treated and proceed as a group or 26 class complaint for all purposes, and the Director has issued the following Complaint of 27 Discrimination on behalf of the group or class described below: DFEH v. Law School Admission Council, Inc. (Hejazi, et. al.):



Case number U-200910-G-0011-00-p, filed by Complainant HAMID MICHAEL HEJAZI against Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on January 19, 2010.

Case number U-200910-G-0012-00-p, filed by Complainant NICHOLAS E. JONES against Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on January 21, 2010.

Case number U-200910-Q0003-00, filed by Complainant against Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on May 9, 2010.

The Director's determination and issuance is based on the following:

- 1. Complainants HAMID MICHAEL HEJAZI, NICHOLAS E. JONES and (hereinafter "Complainants") filed individual verified complaints in writing with the Department on the dates herein indicated alleging that Respondent LAW SCHOOL ADMISSION COUNCIL, INC. (hereinafter "LSAC") engaged in unlawful practices against them which were discriminatory on the basis of disability, in violation of the Fair Employment and Housing Act ("FEHA"), Government Code section 12900, et. seq. and the Unruh Civil Rights Act, Civil Code section 51.
- 2. The Department's investigation revealed that LSAC is a proper respondent for all purposes in this matter.
- 3. The group or class of which the Complainants are members is comprised of all disabled individuals in the State of California who have or will request a reasonable accommodation for the Law School Admission Test ("LSAT"), administered by the LSAC, and who have or will be unlawfully denied such request from January 19, 2009 to the conclusion of the Department's investigation of this complaint.
- 4. There are common questions of law and fact involved which affect the parties to be represented and those persons similarly situated in that during the course of the Department's investigation the Complainants provided and the Department obtained information, which, if proven, indicates that LSAC unlawfully denied or denies disabled individuals reasonable accommodations for the LSAT. Respondent disputes some of these allegations. The Department will continue the investigation to determine the merits of these allegations.

	Property Control of the Control of t		
	5.	The nature of the group or class is such that proof of a single set of facts wi	11
	establish the	right of each member of the group to recover.	
arteman programme (faile	6.	The Director will fairly and accurately represent the interests of the group or class.	
- James State Sandard Co.	7.	You may, but need not, respond to this notification in writing by submitting you]]
	response to:		•
		Alexandra Seldin Special Investigations Unit Administrator	
		Department of Fair Employment and Housing	
		2218 Kausen Drive, Suite 100 Elk Grove, CA 95758	
	*.		
	DATED: Jul	y^{2} , 2010	
-		DEPARTMENT OF FAIR EMPLOYMENT	
		AND HOUSING	
		PHYLLIS W. CHENG Director	
-		By:Phyllis W. Cheng	
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* * PUBLIC ACCOMMODATION/RALPH/CIVIL CODE SECTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDE		EH# U 201112	H-0007-00-р
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RIGHTS ACT, THE RALPH CIVIL RIGHTS		TANS 51 5 AND 54	
COMPLAINANT'S NAME(S) (indicate Mr. or Ms.; if indivi		application of the second of t	
JOHNSON, ALEX (MR.)	334,		
ADDRESS	Photo-life purchase and automatical special special states and special	TELEPHONE MUNIC	ER (INCLUDE AREA CODE)
1447 La Linda Drive			60-736-0119
CITY/STATE/Z/P	COUNTY	the section of the se	COUNTY CODE
San Marcos, CA 92078	San Diego		073
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DISCRIMINATED AGAINST ME:		Carro tekno tender timo (mino por proposition and proposition	The state of the s
NAME(S)	// A & C \		
Law School Admissions Council, Inc.	A the first of the second seco	TELEGRAPHE TO LAD	ER (INCLUDE AHEA CODE)
662 Penn Street			15-968-1001
CITY/STATE/ZIP	COUNTY	and the second second section of the second second second section is a second second section of the second second section sect	COUNTY CODE
Newtown, PA 18940	Out of State	InditAbelia ministry en	000
CAUSE OF DISCRIMINATION BASED ON (CHECK APPRIL D RACE DISEX D DISABILITY		ORIGIN/ANCESTRY	SEXUAL ORIENTATION
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DATE MOST RECENT OR CONTINUING DISCRIMINATIO		# Date State Complete Contract in a Contract Copies (State of State of State of Complete Contract of C	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year). September	17, 2010		Unruh
THE PARTICULARS ARE:	And the second supplied a second of the seco	and the second of the second and a second and a second and a second and the secon	and or we want to the substitution of
t. On or about 9/17/10 I was denied the	reasonable accommodation	n needed to take th	e LSAT (Law School,
Admissions Testj.			•
av at a state of the state of	t f	. Ask ^a	
II. No reason was given for partial denial		odation and the gra	nting of
inadequate/ineffective accommodation	ns.		
III. I believe I was denied reasonable acci	ommodiation, which is neces	ssary due to my dis	ability (Quadriplegia),
which is a violation of Government C			
of the Civil Code. My belief is based		The state of the s	
U. CHO OIVII COOC. THE DONOT TO ENGUGA		•	
A. On or about 8/5/10 Ladvised the	Accommodated Testing sec	ction of my medical	need for
accommodation in the form of us	ing a computer for all section	ons of the test, 120	extra minutes on
each section of the test, alterna	te to scantron enswer sheet	t, use of amanuensi	s (to turn pages),
additional rest period and breaks,			· · · · · · · · · · · · · · · · · · ·
accommodations were medically		-	
•	· · ·		
B. On or about 9/17/10 I was notified	ed that part of my requested	i accommodation v	vas being denled. The
accommodations that were grant	ed were inadequate and ine	ffective.	
IV. I am making this complaint on behalf		bled individuals wh	o have been, are now,
or will in the future be similarly aggris	eved.		
Typed and mailed for signature on August 23, 2011. I declare under penalty of perjury under the laws of	of the State of California that the	foraciones la trea and co	stract of rase outs
knowledge except as to matters stated on my info	ormation and belief, and as to the	se matters I believe it to) be true.
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DEPARTMENT OF FAIR EMPLOYMENT AND HOU		II II AUG 292	1018TALE OF CALIFORNIA
•		DEPT OF FAIR EMPLOYM	INT & POUSING
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EXELEGIT 5

* * * PUBLIC ACCOMMOT TION/RALPH/CIVIL CODE ST TIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER T	WE DFEH # U 20111	12 H-0008-00-p
PROVISIONS OF THE CALIFORNIA FAIR EMI		and the second s
AND HOUSING ACT WHICH INCORPORATES		
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT		154
COMPLAINANT'S NAME(S) (Indicate Mr. or Ms., if individual)		
ADDRESS	TELEPHONE	VUMBER (NCLUDE AREÁ CODE)
	- 70 minut V V Var / V	XXX-XXX-XXXX
CITY/STATE/ZIP	COUNTY	COUNTY CODE
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NAMED IS THE PERSON, BUSINESS ESTABLIS	HMENT, PUBLIC ACCOMMODATION OR O	THER ENTITY THAT
DISCRIMINATED AGAINST ME:		المراجعة والمعارضة والمعار
Law School Admissions Council, Inc. (LA	1 S C 1	
ADDRESS		NUMBER (INCLUDE AREA CODE)
662 Penn Street		215-968-1001
CITY/STATE/ZIP	COUNTY	COUNTY CODE
Newtown, PA 18940 CAUSE OF DISCRIMINATION BASED ON ICHECK APPROPRI	Out of State	
☐ RACE ☐ SEX ☑ DISABILITY ☐ COLOR ☐ AGE ☐ MARITAL STATUS ☐	J RELIGION DI NATIONAL ORIGIN/ANCESTRY J OTHER (SPECIFY)	D SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION	3040	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) October 31, 2 THE PARTICULARS ARE:	2010	Unruh
I. On or about 10/31/2010 I was denie	d the reasonable accommodation of ade	quate additional time to
take the LSAT (Law School Admissio		,
	1 . 6	t of
II. No reason was given for partial denia	ii ot my reasonable accommodation.	
Syndrome with Brain edema resulting	commodation in the form of additional te by disabilities (ADD [Attention Deficit Di- g in brain processing speed impairment). The Government Code incorporates Sect	sorder), Lemierre's Which is a violation of
	sed the Accommodated Testing section eak periods. I also provided supporting	
	fied that my requested accommodation was not gran	
IV. I am making this complaint on behalf now, or will in the future be similarly Typed and mailed for signature on August 22, 2011.	aggrieved,	
I declare under penalty of perjury under the laws of the knowledge except as to matters stated on my inform	he State of California de the foregoing is true a	
knowledge except as to matters stated on my inform	ation and belief. Asse matters I believ	e it to be true,
0/21/2011		
Dated 5/0/0/0///	COMPLAINANTESSIGNAS	
Dated 8/26/2011 At Rayolo Sa & Se CA	MARCE	WEM
City	COMPLAINANT'S SENATURE/GUARI	PIANADUTAN
DFEH-300-02 (12/99) B:PND	DATE FILED:	Fig. 124 f
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSE		WENT & HE WANTE OF CALIFORNIA

EXFIBIT 6

* * * PUBLIC ACCOMMOD/ TON/RALPH/CIVIL CODE SEC TONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE	DFEH # 0 201112	Н-0013-00-р
PROVISIONS OF THE CALIFORNIA FAIR EMPLOYM		anne de la maste maste la maste la maste la maste la maste la companya de la companya de la companya de la comp
AND HOUSING ACT WHICH INCORPORATES THE U		
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT AND	CIVIL CODE SECTIONS 51.5 AND 54	
COMPLAINANT'S NAME(S) (indicate lvr. or Ms., if individual)	to the contraction of the contra	
HENNESSEY-SEVERSON, ELIZABETH (MS.)	(-Gb3-	
ADDRESS	TELEPHONE NUM	BER (INCLUDE AREA CODE)
1067 Oak Street	COUNTY	(XX-XXX-XXX
San Francisco, CA 92101	San Francisco	COUNTY CODE
NAMED IS THE PERSON, BUSINESS ESTABLISHMENT	Company of the Compan	075
DISCRIMINATED AGAINST ME:	, ropeic accommunation on utn	IN CIVILIT I MAI
MAME(S)		and the state of t
Law School Admissions Council, Inc. (LSAC)		
ADDRESS	TELEPHONE NUM	BER (INCLUDE AREA CODE)
662 Penn Street		215-968-1001
CITY/STATE/ZIP	COUNTY	COUNTY CODE
Newtown, PA 18940	Out of State	000
CAUSE OF DISCRIMINATION BASED ON CHECK APPROPRIATE BOX		part on the real time to the part of the part of the
☐ RACE ☐ SEX		C) SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year). May 10, 2011	·	Unruh
THE PARTICULARS ARE:		And the second s
I. From on or about 4/29/11 I was denied the		ate additional time to
take the LSAT (Law School Admissions Tes	t),	
If the appearance of the desired of many appearance	anisla na annova a datlaw	
II. No reason was given for denial of my reason	table accommodation,	
III. I believe I was denied reasonable accommod	fation in the form of additional test t	aking time, which is
necessary due to my disabilities (Anxiety, Pr		-
Hyperactivity Disorder [ADHD]), which is a	-	
Government Code incorporates Section 51 c		· · · · · · · · · · · · · · · · · · ·
	•	
A. On or about 4/27/11 I advised the Accor	nmodated Testing section of my me	dical need for
additional test taking time as well addition	onal breaks in between test sections	. I also provided
supporting medical documentation.		
B. On or about 4/29/11 and again 5/10/11	I was notified that my requested ac	commodation was
being denied.		
IV. I am making this complaint on behalf of mys		who have been, are
now, or will in the future be similarly aggriev	ved. ·	
Typed and mailed for signature on September 14, 2011. I declare under penalty of perjury under the laws of the State	of California that the foregoing is true and o	orract of the own
knowledge except as to matters stated on my information and		
1 /	way and	
noted 9/22/2011	ES H	,
Dated 1/2011	COMPLAINANT'S SIGNATURE	Lakiyadan karanda ayda yaya yaya (1964) i halifadi i halifadi in h
C Proceedings	(1) - (1) -	
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City	COMPLAINANT'S BISNATURE GUARDIAN	ADLITEM
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Case 3:12-cv-01830-JCS Document 104 Filed 02/07/13 Page 53 of 77

* * * PUBLIC ACCOMN DATION/RALPH/CIVIL CODF TECTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER	RTHE DEEH #	201112 H-0018-00-p
PROVISIONS OF THE CALIFORNIA FAIR E AND HOUSING ACT WHICH INCORPORAT	MPLOYMENT	
RIGHTS ACT, THE RALPH CIVIL RIGHTS /	ACT AND CIVIL CODE SECTIONS 51.5	AND 54
COMPLAINANT'S NAME(S) (Indicate Mr. or Me., if Individ LEE, CAROLINE FAVROT (MS.)	(ual)	and the second and the second
ADDRESS 676 Alcatraz Avenue	TELEPI	HONE NUMBER (INCLUDE AREA CODE) 510-655-1758
CITY/STATE/ZIP	COUNTY	COUNTY CODE
NAMED IS THE PERSON, BUSINESS ESTABLE DISCRIMINATED AGAINST ME:	Alameda LISHMENT, PUBLIC ACCOMMODATION	OO1 OR OTHER ENTITY THAT
NAME(S) Law School Admissions Council, Inc. (
662 Penn Street		ONE NUMBER (INCLUDE AREA CODE) 215-968-1001
CITY/STATE/ZIP	COUNTY	COUNTY CODE
Newtown, PA 18940 CAUSE OF DISCRIMINATION BASED ON ICHECK APPRO	Out of State	QOO
D RACE DEX B DISABILITY D COLOR D'AGE D MARITAL STATUS	D RELIGION DINATIONAL ORIGIN/ANCI DIOTHER (SPECIFY)	ESTRY DI SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (month, day, and year) April 28, 20		TYPE OF COMPLAINT Unruh
THE PARTICULARS ARE		n gann (1900 few) (1909 and 1909) (1909 and 1909 few) (1909 and 1909 and 19
f. From on or about 10/2010 I was d	enied reasonable accommodation to t	ake the LSAT (Law School
Admissions Test).	ϵ	
II. No adequate reason was given for	denial of my reasonable accommodat	ion.
117 - 1 fronting to 3 years of and a discount manage to a	and a second	
III. I believe I was denied reasonable a	s), which is a violation of Government	
	otion 51 of the Civil Code. My belief i	
	the Accommodated Testing section oalso provided supporting medical docu	•
B. Most recently on or about 4/28 denied.	7111 was notified that my requested	accommodation was being
IV. I am making this complaint on behi	elf of myself and all other displication	ividuale who have been are
now, or will in the future be similar		iviocate with have been, ate
Typed and mailed for signature on September 28, 2011. I declare under penalty of perjury under the laws of	f the State of California that the foregoing is r	rue and correct of my lowe
knowledge except as to matters stated on my info		
Dated Sept 29 2011	<u> Calabian Danas D</u>	
At Oakland	COMPLAINANT'S SIG	EGETVE POL
At City	COMPLAINANT'S SIGNATURE OF	UARDIAN AD LITEM
DFEH-300-02 (12/99) BIPND	DATE PILED:	507 C3 2011 Line
DEPARTMENT OF FAIR EMPLOYMENT AND HOUS	DEPT (OF FAIR EMPLOYMENT & HOOSING A LIFORNIA AKERSFIELD DISTRICT OFFICE

EXELLS II 8

10/06/2011 05:19

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* * * PUBLIC ACCOMMODATION/RALPH/GIVIL CODE SECTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER PROVISIONS OF THE CALIFORNIA FAIR EM AND HOUSING ACT WHICH INCORPORATE RIGHTS ACT, THE RALPH CIVIL RIGHTS AC	IPLOYMENT S THE UNRUH ST AND CIVIL (CIVIL		<u>2 н-0021-00-р</u>
COMPLAINANT'S NAME(S) Indicate Mr. of Me., if individuo	1)	The state of the s	PETER E NEE FELF & A THIS WAY, A MICHIEF CLEANE LEE MANNEY ALL MAN	大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大大
BANKS, RAYMOND (MR.)	AND THE RESERVE OF THE PROPERTY OF THE PROPERT		TELEPHONE NUM	TEER (INCLUDE AREA CODE)
P. O. Box 156661	g-www.comageonssaurongeona-communica-anona espec	The the fall have been and the second		XXX~XXX~XXX
San Francisco, CA 94115		TUNTY Tancisco		COUNTY CODE
NAMED IS THE PERSON, BUSINESS ESTABLIS			TATIONI OR OTE	
DISCRIMINATED AGAINST ME:	5171712141, 1 0 000	1160 1264 60 60 50 (24 4 6)	DASIDE DIEGIE	that white the filthan
JAME(S)	andre and a series of	ya yana, wasan kana kana kana kana kana kana kana 	99°-жені 14°-96 Жийніго па комоность, доку дотогідной ў петереную адець.	المقارات ساوت والمقارب و ب دوم فرطونها بمعادت بالمقارب و المقارب و المقارب و المقاربة في بوطونها و المقاربة والمقاربة والمقارب
.aw School Admissions Council, Inc. (Li	SAC)	ويودون والمراودة	TELEPLE NEW	HEER (INCLUDE AREA CODE)
362 Penri Street				215-968-1001
JITY/STATE/ZIP		TUNTY	takin kamban da kamban kaban da kamban d	COUNTY CODE
Newtown, PA - 18940 Cause of discrimination based on (Check appropr	Hallander and a special process of the second section of the section of the second section of the section of the second section of the sectio	if State		000
RACE DSEX DISABILITY E	J RELIGION	RO JANDITAN D	IGIN/ANCESTRY	SEXUAL ORIENTATION
COLOR DIAGE DIMARITAL STATUS E DATE MOST RECENT UN CONTINUING DISCHIMINATION	OTHER (SPECIFY		entermone y 1 mais ann an Aireannach a seine an ann ann an Aireannach (1 mhaigh an Aireannach A Bailleagh (1 mhainn an y Eagainn an Aireannach gear ann aireach (1 mhaigh an Aireannach an Aireanna	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) January 31, 2	2011			Unruh
I. On or about January 2011 I was der take the LSAT (Law School Admission). II. No reason was given for denial of mills. I believe I was denied reasonable accessary due to my disabilities (Ner which is a violation of Government CS1 of the Civil Code. My belief is beautiful additional test taking time. I also B. On or about January 2011 I was IV. I am making this complaint on behalf now, or will in the future be similarly the ond mailed for signature on August 26, 2011. declare under penalty of perjury under the laws of the complaint on the laws of the complaint on the laws of the complaint of the laws of the complaint of the laws of the complaint on the laws of the complaint of of	ons Test). y reasonable a commodation inverse and Musck Code, Section used on the foliated the Accomp provided sup notified that r f of myssif and y aggrieved.	accommodation in the form of damage in le 12948. The Clowing: mmodated Tes porting medica my requested all other disa	additional test ft shoulder/arm fovernment Co ting section of al documentation accommodation bled individuals	taking time, which is V. de incorporates Section my medical need for on. I was being denied. Is who have been, are
nowledge except as to matters stated on my inform	iation and boliet.	and as to those n	hatters I bollove It	to be true.
Dated 10/6/11	Lagra &	en arror de de de la companya de la	NT'S SIGNATURE	
CHY DEEH-300-02 (12/99) DEPARTMENT OF FAIR EMPLOYMENT AND HOUSIN	C	lainant's Sign. Ate filed:		O STATE OF CALIFORNIA
				APLOYMENT & HOUSING LD DISTRICT OFFICE

EXEIBIT 9

* * * PUBLIC ACCOMMO ATION/RALPH/CIVIL CODE STOTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE		DFEH #	U 201112	Н-0023-00-р
PROVISIONS OF THE CALIFORNIA FAIR EMPLO AND HOUSING ACT WHICH INCORPORATES TH				
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT A			51.5 AND 54	ļ
COMPLAINANT'S NAME(S) (Indicate Mr. or Ms., if individual)	ZAMINGTONIA CERTONICA CARRANTA CARRANTA A CARRANTA CARRAN	rakentrakinista kinsintrakentrakentrakentrakiat (h. 1260).	erana, erannye enyerikara-dhousikapakhkalaye-dasherakeri-ed	TO PROPERTY THE PROPERTY OF TH
TALESHPOUR, GAZELLE (MS.)				
ADDRESS		7	ELEPHONE NUM	BER (INCLUDE AREA CODE)
6756 Bestwood Court	ne para labara (a mala laba) kafa anya ang 190 milijah di kanjananyak ni 1919, akin i Amarinak	The state of the s	X	XX-XXX-XXXX
CITY/STATE/ZIP	COUNTY			COUNTY CODE
Sen Diego, CA 92119	San Diego		the State of the same of the same of the	073
NAMED IS THE PERSON, BUSINESS ESTABLISHM DISCRIMINATED AGAINST ME:	ENT, PUBLIC AL	JOUMMUUA	IUN UK UIH	ER ENTITY THAT
NAME(S)				
Law School Admissions Council, Inc. (LSAC	,) 	**************************************	TELETA SPONES AND	Designation of the second
ADDRESS		ı		BER (INCLUDE AREA CODE)
662 Penn Street	COUNTY	annimated increase enteres the animated discourse	La company de la	215-968-1001 COUNTY CODE
Newtown, PA 18940	Out of Sta			000
CAUSE OF DISCRIMINATION BASED ON ICHECK APPROPRIATE				to the second state of the second
☐ RACE ☐SEX Ø DISASILITY ☐ REL		ATIONAL ORIGIN	WANCESTRY	CI SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION	Paul F Spd - And Spd - E A	- The state of the		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) December 6, 20	0			Unruh
THE PARTICULARS ARE:		anners and the processing and another and the second second second second second	a de la composition	она и у поскольц объеми насемен бощ принасольно набали рочно законо 1844 (поской 1944) (пост
 Most recently on or about 12/6/10 I was 	; denied the rea	asonable acc	emmodation	to take the LSAT
(Law School Admissions Test).				
II. No adequate reason was given for denia	of my reasons	able accomm	lodation.	
III. I believe I was denied reasonable accommoderation of disabilities (Dyslexi which is a violation of Government Code 51 of the Civil Code. My belief is based	a, ADHD, Com Section 1294	plications du 18. The Gov	ie to bone m	arrow transplant),
A. On or about 2008 and again starting medical need for reasonable accomm				
B. Most recently on or about 12/6/10 I accommodation was being denied.	was notified th	at at least p	art of my rec	luested
IV. I am making this complaint on behalf of now, or will in the future be similarly ag Typed and malled for signature on September 30, 2013. Correct	grieved. ad and re-mailed Oct	tober 7, 2011.		
I declare under penalty of perjury under the laws of the S knowledge except as to matters stated on my information	ate of California to and a	hat the foregoi s to those mat	ng is true and c ters i believe it	orrect of my own to be true.
Α	The state of the s	market Assessed 1-15.	The state of the s	y t
and with a sill	T. Alo		A surrent st	
Dated Oct 1777, 2011	appeare -	COMPRAINANT	1/2/2/2/ "S/SIGNATURE	PHILA BELLA WITH LAND TO A SECTION OF THE PROPERTY OF THE PROP
	and the same of th	THE		From Street of S
At ()	Santa and a second		<u> </u>	
City	COMPLAINA	ANT'S SIGNATI	URE/GUARDIAN	ADUTEM
. Grey.	me man and which help and		CT 19 117.0	
DFEH-300-02 (12/99) B:PND	DATE	FILED: U	policy	The section 1
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING		1 1	F PAIR EMPLOYMEN	TENNIA PE CALIFORNIA
		UCTI U	KERSFIELD DISTRIC	TOFFICE

EXHIBIT 10

* * * PUBLIC ACCOMM LATION/RALPH/CIVIL CODE SELTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER		DFEH #	
PROVISIONS OF THE CALIFORNIA FAIR ENANG HOUSING ACT WHICH INCORPORAT RIGHTS ACT, THE RALPH CIVIL RIGHTS A	ES THE UNRUH C	IVIL IDE SECTIONS 51.5 AND 9	54
COMPLAINANT'S NAME(S) findicate Mr. or Ms., if individ		MPSET DEEM TO THE COMMENT OF THE COM	himitada, may maguna dinanony a nga padang kana magunagan dinangan anga nga atawa pamanangan pada dan dinangan
ADDRESS	and the street of the street o		MBER (INCLUDE AREA CODE)
CHTYISTATEIZIF	COL	en de la composition della com	COUNTY CODE
CHITOSACCIAIS	Out of		000
NAMED IS THE PERSON, BUSINESS ESTABL DISCRIMINATED AGAINST ME:	ISHMENT, PUBLIC	CACCOMMODATION OR OT	HER ENTITY THAT
NAME(S) Law School Admissions Council, Inc. (LSAC)		
ADDRESS		TELEPHONE NUI	MBER (INCLUDE AREA CODE)
662 Penn Street	COL	INTY	215-968-1001 COUNTY CODE
Newtown, PA 18940	· Out of		000
CAUSE OF DISCRIMINATION BASED ON (CHECK APPRO D RAGE DISEX D DISABILITY D COLOR D AGE D MARITAL STATUS		D NATIONAL ORIGIN/ANCESTRY	SEXUAL OFIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION		e de mande en particular de la particular de maniera, comprese que que particular de particular de mande en la forma de la forma de mande en la forma de la forma della forma de la forma della forma della forma de la forma della forma della forma de la forma della forma	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) October 21 THE PARTICULARS ARE:	, 2010	HPA	Unruh
 I. On or about 10/21/10 I was denied Admissions Test). II. The reason citd for denying my reconstruction limits. III. I believe I was denied reasonable at Deficit—Hyperactivity Disorder [AI Code, Section 12948. The Govern based on the following: A. On or about 8/2010 I advised reasonable accommodations. 	quest for reasonal ted a major life ac accommodation, v OHD] and Learning ament Code incor	ole accommodation was the tivity. which is necessary due to no g Disabilities), which is a viporates Section 51 of the (at documentation did ny disabilities (Attention clation of Government Civil Code. My belief is
B. Most recently on or about 10/2 denied.	21/10 I was notifi	ed that my requested acco	mmodations were being
IV. I am making this complaint on beh now, or will in the future be simila		all other disabled individua	ls who have been, are
Typed and mailed for signature on September 27, 2011. I declare under penalty of perjury under the laws of knowledge except as to matters stated on my info	of the State of Culifor	nia that the foregolng is true and nd as to those matters I believe I	correct of my own to be true.
Dated 03/27/2011			
AT Scottsdille, 177	IGAACIT	AINANT'S SIGNATURE AUARDA	เกิ อ้าที่เป็นเกิด โดย
DFEH-300-02 (12/99) B:PND DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING	D/	ATE FILED: 9/24/11 1	OF ATE OF CAN ICODAIA

EXHIBIT 11

Case 3:12-cv-01830-JCS Document 104 Filed 02/07/13 Page 61 of 77

FUDLIC ACCUMING MITURINALF MOTAL CODE PROTOTO O 1.0 & 04

COMPLAINT OF DISCRIMINATION UNDER PROVISIONS OF THE CALIFORNIA FAIR E AND HOUSING ACT WHICH INCORPORAT BIGHTS ACT, THE RALPH CIVIL RIGHTS A	MPLOYMENT ES THE UNRUH CIV	OFEH #	4
COMPLAINANT'S NAME(S) (indicate Mr. or Ms., if Individ	uel}	And a subsequence of the subsequ	ni nday, mananga (ng ng ga (na ng pilat k acada katana kanananana ka kalamat property ni namun kangga ning
ADDRESS 6512 Monero Drive			BER (INCLUDE AREA CODE) 310-544-2993
CITY/STATE/ZIP	COUN	L.A.	COUNTY CODE
Rancho Palos Verdes, CA 90275 NAMED IS THE PERSON, BUSINESS ESTABL DISCRIMINATED AGAINST ME:	Los Ang ISHMENT, PUBLIC A	The second of the second state of the second state of the second	037 ER ENTITY THAT
Law School Admissions Council, Inc. (LSAC)	,	
ADDRESS 662 Penn Street			BER (INCLUDE AREA CODE) 215-968-1001
Newtown, PA 18940	coun Out of S		COUNTY CODE 000
CAUSE OF DISCRIMINATION BASED ON ICHECK APPROI	************		UUV
☐ RACE ☐SEX ☑ DISABILITY ☐ COLOR ☐ AGE ☐ MARITAL STATUS		NATIONAL ORIGIN/ANCESTRY	SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION			TYPE OF COMPLAINT
TOOK PLACE (month, day, end year) February 28 THE PARTICULARS ARE:	, 2011	And the State And September 1 (1974)	Unruh
I. Most recently on or about February (Law School Admissions Test). II. No adequate reasons were given for the life. I believe I was denied reasonable and ADD [Attention Deficit Disorder] and Section 12948. The Government Contine following: A. On or about 2008, 11/2010 and	r denial of my rees commodation which d Gertsmann Synd Code incorporates S	onable accommodation. oh is necessary due to my rome), which is a violation lection 51 of the Civil Coc	disabilities ((Epilepsy, of Government Code, de. My belief is based
medical need for accommodation			
B. Most recently on or about Febru being denied.	iary 2011 I was no	tified that my requested a	commodation was
IV. I am making this complaint on beha now, or will in the future be similar Typed and mailed for signature on September 30, 2011.		other disabled individuals	who have been, are
I declare under penalty of perjury under the laws of knowledge except as to matters stated on my infor			
Dated 75-1011	System Sterior	COMP. A BLANCTIC CHARLESTEET	A District and Annie of Parameters in Contract of the Contract
		COMPLAINTEGET	E Promotorial Prom
At	COMPLAIN	ANT'S SIGNATURE/GUARDIAN	Y A C LLTDEN
DEEH-300-02 (12/99) B:PND	DATE	FILED: OFFAIR FMPLOYMENT	& HOUSINGS OF CALLEDONIA

EXFIBIT 12

* * * PUBLIC ACCOMMODATION/RALPH/CIVIL CODE SECTIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE	DFEH # U 201112 H-0027-00-	Þ
PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT WHICH INCORPORATES THE UNRUI RIGHTS ACT, THE HALPH CIVIL RIGHTS ACT AND GIVIL		ter iorem, ninest
COMPLAINANT'S NAME(SI lindicate Mr. or Me., if individual)	CODE SECTIONS 31.3 ARD 34	ji nasala mnyajiya
DECOMO-SCHMITT, RODNEY ALEXANDER	TELEPHONE NUMBER (INCLUDE AREA CO	net
4579 Peradise Drive	XXX-XXX	UG)
	COUNTY CO	jE,
VAMED IS THE PERSON, BUSINESS ESTABLISHMENT, PUB		
DISCRIMINATED AGAINST ME:	more consistent and consistent and the second consistent and consi	
Law School Admissions Council, Inc. (LSAC)		
ODRESS 382 Penn Street	TELEPHONE NUMBER INCLUDE AREA CO	DE.
SITY/STATE/ZIP	215-968-1001 COUNTY COUNTY COUNTY COUNTY	ΣÉ
Newtown, PA 18940 Out (DAUSE OF DISCRIMINATION BASED ON (CHECK APPROPRIATE BOX(ES))	of State 000	alianari elektroni
jrace dsex & disability direction J Color d'age di marital status di other ispecie	CINATIONAL ORIGIN/ANCESTRY DI SEXUAL ORIENTA	TION
DATE MOST RECENT OR CONTINUING DISCRIMINATION FOOK PLACE Impirth, day; and year October 25, 2010	TYPE OF COMPLAINT UNFUH	
THE PARTICULARS ARE: 1. Most recently on or about 10/25/10 I was denied School Admissions Test).	reasonable accommodation to take the LSAT (L	ā\V
 LSAC stated that the documentation submitted di activity. 	id not support that my condition limited a major l	ife
III. I believe I was dented reasonable accommodation necessary due to my disabilities (Learning Disability of Government Code, Section 12948. The Gover Code. My belief is based on the following:	ty-Reading Processing Problem), which is a viol	ation
A. On or about 9/2010 advised the Accommode reasonable accommodation. I also provided su		
 Most recently on or about 10/25/10 I was not dealed. 	ified that my requested accommodation was bei	ng
IV. I am making this complaint on behalf of myself an now, or will in the future be similarly aggrieved. Typed and mailed for algricular on Delober 13, 2011.	nd all other disabled individuals who have been, a	ire
decisie under penalty of perjury under the laws of the State of Calif mowledge except as to matters stated on my information and belief,	ionia that the isregoing is true and correct of my own , and as to those matters i believe it to be true.	
pared 10-13-11 ACK 16	COMPLAINANT'S SIGNATURE	
,	V = M M M M V G G G G G G G G G G G G G G G	
At Albuman allema const	FLAINANTIS-SIGNATURE/GUARDIAN-AD-LESEM	
	DATE FILED. E U B STATE OF CALIFO	HNIA
	H by Styl Figure	
00/200 d 801/#	DEPT OF TATE FEW ON PAYS A HOUSING	17/6

EXFIBIT 13

* * * PUBLIC ACCOMMODA	TION/RALPH/CIVIL CODE SEC	TIONS 51.5 & 54 * * * 201112 H-0028-00-p
COMPLAINT OF DISCRIMINATION UNE PROVISIONS OF THE CALIFORNIA FAIR IND HOUSING ACT WHICH INCORPOR RIGHTS ACT, THE RALPH CIVIL RIGHTS	DEN THE OFEH # OFEH # ATES THE UNRUH CIVIL	
OMPLAINANT'S NAME(S) (Bidicate MC or Ws., IFING BROSSMAN, ANDREW "ANDY" (ME		iye termenmedindi nanmay oʻgʻilgini ili ballati iyi ili dalarida mattama tiladi qora filmbil aynamay oʻgʻilgin dalari ili ballati ili dalari oʻgʻilgin ili ayna tiladi qora filmbil ayna dalari ili da
oness 4780 Facwell Avenue	Described and the second of	HONE NUMBER INCLUDE AREA CODE! 408-741-5859
RY STATEZZIP Gratoga, CA 95070	Santa Ölərə	COUNTY CODE 085
DAMED IS THE PERSON, BUSINESS ESTA DISCRIMINATED AGAINST ME:		
aw School Admissions Council, Inc		PIONE NUMBER INICLADE AREA COOR
562 Penn Street	1500	21/5-968-1001
ov statezip Newtown, PA 18940	SOUNTY Out of State	COUNTY CODE
AUSE OF DISCRIMINATION BASED ON CHECK ACT BASE CSEX STOISABILITY BOOLOG CLASE CHARRITAL STATUS	NAME OF THE PARTY	سيرس أحاسب و هسيد و ه العاديم إحداثه و مدارة و مدارة المواهد المواهد المواهد المواهدة المواهدة في مدارة و مدارة المواهدة في ال
ATE MOST RECENT OR CONTINUES DISCRIMINAT COK PLACE (MONTH, day, and year). NOVETH DE		TYPE OF COMPLAINT Unruly
III. believe was denied reasonable Brain injury and Depression/Anxi	tial denial of my reasonable accommod e accommodation which is necessary d lety Disorded, which is a violation of G incorporates Section 51 of the Civil Co.	us to my disabilities (Traumatil overnment Code, Section
	10 Ladvised the Accommodated Testing on. Lateo provided supporting medical	
8. Most recently on or about 11 being denied.	F/2010 I was notified that part of my re	equested secommodation was
IV. I am making this complaint on bu now, or will in the future be simi	ehalf of myself and all other disabled in liarly aggrieved.	rdividuals who have been, are
declare under penalty of pedary under the laws nowledge except as to matters stated on my in		
med 10/17/11	Arrely Aress	SPACO 17.
· Sarataor	and a Strawn	7) - 1744),
the CHY "	COMPLAINANTS AFFISTERS	ELANGATA O LETA
FEH-300-02 (12/33) B;PND EPARTMENT OF FAIR EMPLOYMENT AND HO	USING DATE FILED	TAGE OF CALIFORNIA

EXILBIT 14

* * * PUBLIC ACCOMMOP * TION/RALPH/GIVIL CODE SECTIONS 51.5 & 54 * * *

			: H-0029-00-p
COMPLAINT OF DISCRIMINATION UNDER THE		DFEH #	m may the this section is to produce the state of the section of t
PROVISIONS OF THE CALIFORNIA FAIR EMPLO	YMENT		
AND HOUSING ACT WHICH INCORPORATES TH	E UNRUH CIVIL		
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT AN	IN CIVIL CODE SEC	TIONS 51.5 AND 54	
COMPLAINANT'S NAME(S) lindicate Mis or Ma., if individ	(all	والمعاونية والمراوية والمر	المراقبة والمطابقة والمستعمد والمستع
	(Mat)	•	
COLLINS, KEVIN M. (MR.)		TELEPHONE AND	WBER (INCLUDE AREA CODE)
ADDRESS		1 la 3.05m 1 3 3 0.07 (3 las 3.4.52)	818-346-4200
23140 Victory Blvd.	<u> </u>	YTRUC	CGUNTY CODE
CITY/SYATE/ZIP	Los Ar		037
Woodland Hills, CA 91367 NAMED IS THE PERSON, BUSINESS ESTAB	LOUNATAIT DUDI	TO GO MOITA COMMACO ON A	
MAINTED IS THE LERSON ROSINESS ESTAD	LISHMENT, FUDL	IC ACCOMMODATION OF OT	(Lit Livit I I I I I I I I I I I I I I I I I I I
DISCRIMINATED AGAINST ME:	والمقطعة والمراجع والمنطقة فلا مسيان والمناوع والمادات المادات المادات المادات والمادات والمادات والمادات والم		A THE RESIDENCE OF THE PROPERTY OF THE PROPERT
NAME/S)			
Law School Admissions Council, Inc. (LSAC)	and the second	TELLERALE SIL	MBER (INCLUDE AREA CODE)
ADDRESS		(ELETHONE NO	215-968-1001
662 Penn Street	And the second s	YTAUC	COUNTY CODE
CITY/STATE/ZIP		State	:000
Newtown, PA 18940 CAUSE OF DISCRIMINATION BASED ON ICHECK APPRO		The state of the s	deliceres de la company de la company de partir de la company de la comp
CAUSE OF DISCRIMINATION BASED DISABILITY	II RELIGION	EI NATIONAL ORIGIN/ANCESTRY	D SEXUAL ORIENTATION
O COLOR DAGE O MARITAL STATUS	COTHER (SPECIFY	()	
DATE MOST RECENT OR CONTINUING DISCRIMINATION	N		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) Warch 14,	2011		Unruh
was in the American Electric ACSE (newspace (See Annie 1994) was suited to the See Annie (See Annie 1994) and the See Ann	A company of the contract of t
I. On or about 1/18/11 and most rec	ently on 3/14/1	1 I was denied reasonable ac	commodation to take
the LSAT (Law School Admissions	Test		
the LSAT (Law School Admissions	1034.	•	
			and the sines for the
II. The denial on 1/18/11 was alleged	By due to insuffi	cient documentation. No re	ason was given for the
partial denial of my requested reas	ionable accommi	odation on 3/14/11.	
partial dayner or stay and and a second			
III. I believe I was denied reasonable	naanmandation	which is people any due to m	v disabilities (Gifted
III. I believe I was denied reasonable	ECCORMING TO 1	Common to Microsoft which	in a violation of
Learning disability: Reading Disor	der and written	expression disorder, which	is a violation of
Government Code, Section 12948	. The Governme	ent Code incorporates Section	on or or the Civil Code.
My belief is based on the followin	ġ:		
A. Beginning on or about 1.2/10/1	O Ladvised the	Accommodated Testing sect	ion of my medical need
for reasonable accommodation	Laten provide	f sunnorting medical docume	entation.
for reasonable accommodation	i. Talso provides	a odbbol mid modern access	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
			a and balan accepted areas
B. On or about 1/18/11 I was not	titled that my red	quested accommodation was	s not being Bisitien evell
thought I believe that all neces	sary supporting	documentation had been su	bmitted.
-			
C. Most recently on 3/14/11 I wa	as notified that n	art of my requested accomp	nodation was being
	is nounce that b	The second secon	•
denied.			
		and the second s	ar i saar i da i saa da da i saa i i i i i i i i i i i i i i i i
IV. I am making this complaint on bal	half of myself an	d all other disabled individua	ils who have been, are
now, or will in the future be similar	arly aggrieved.		
m		Pagagagara No and an analysis and analysis and an analysis and	ar
I it along under penalty of nariury under the laws	of the State of Calif	ornia that the foregoing is true and	correct of my own
knowledge except as to matters stated on my inf	ormation and belief.	and as to those matters I believe	it to be true.
1010 Fr. 100 St. 100 St.	account of market market with	The first the state of the stat	Appendix Control Control Control
12153/11	Company and the second	FREI	W E may
Dated 10/25/11	The state of the s		V 15
1 a N or I am		COMPLANTS SIGNATU	REAL III
At had throlled		Hill are	2011
City		THE WAY TO SEE A	LUII brown
OFEH-300-02 (12/98) B:PND		DATE FILED:	1
DEPARTMENT OF FAIR EMPLOYMENT AND HOL	ISING	DEPT OF FAIR EMPLOY	MENT & HOUSING OF CALIFORNIA

EXEILBII 15

* * * PUBLIC ACCOMMO_ATION/RALPH/CIVIL CODE S_STIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE		DFEH	#	: a-0031-00-b
PROVISIONS OF THE CALIFORNIA FAIR EMPLOAND HOUSING ACT WHICH INCORPORATES TO	,	ımı		and the second s
RIGHTS ACT, THE BALPH CIVIL RIGHTS ACT A			IC E1 E AMD E	Ж
COMPLAINANT'S NAME(S) (Indicate Mr. or Ms., if individual)	IND CIVIL OUL	in Orolidis	is one may	
IOAN, OTILIA (MS.)				
ADDRESS	A CONTRACTOR OF THE PROPERTY O	apada aya matamenta na na maramandan la matamanda	TELEPHONE NUM	MBER (INCLUDE AREA CODE)
5305 Harwood Road	COUN	**************************************	er's lanes - popularior (5 por elso de constituente la la la la constituente la la constituente la constituente	XXX~XXX~XXX
San Jose, CA 95124	Santa C			COUNTY CODE
NAMED IS THE PERSON, BUSINESS ESTABLISHM DISCRIMINATED AGAINST ME: NAME(S)			ATION OR OTH	
Law School Admissions Council, Inc. (LSA)	3)			
ADDRESS		- Company of the Comp		ABER (INCLUDE ABEA CODE)
662 Penn Street	COUN	TV	en en manumen konstruent og en vinne i til konstrukte stættet a stillet fyr till fra sjöllet sjöllet sjöllet s	215-968-1001
Newtown, PA 18940	Out of S			COUNTY CODE OOO
CAUSE OF DISCRIMINATION BASED ON (CHECK APPROPRIATE IT RACE LISEX & DISABILITY II RE	BOX(ESJ)	NATIONAL CRI	GINZANCESTRY	C) SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCHIMINATION	TEAL COLUMN TO THE PROPERTY OF	employed a grand and the second and	- participation of the second	TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) November 17, 2	010	enement and the property of the second section of the property of the second section of the section of the second section of the section of the second section of the sect		Unruh
THE PARTICULARS ARE: I. On or about 11/17/10 I was denied reas	isnahlo: aanam	mondation to	toler than 1 O A	Mark 114 annual of Mark Burnelli V
Admissions Test).	onable accom	HOUSHOH R) take the LSA	F (rgw 2cuool
7 (C43) (CC43) (CC43)				
II. No reason was given for denial of my re-	asonable acco	mmodation		
III. I believe I was denied reasonable accom Injury-Quadriplegia), which is a violation incorporates Section 51 of the Civil Cod	of Governme	ent Code, Se	ection 12948.	disability (Spinal Chord The Government Code
A. On or about 8/2010 I advised the Acreasonable accommodation. I also p				
B. On or about 11/17/10 I was notified	that part of n	ny requester	d accommodat	ion was being denied.
IV. I am making this complaint on behalf of now, or will in the future be similarly ago		other disat	oled individuals	who have been, are
Typed and mailed for signature on September 27, 2011.				
I declare under penalty of perjury under the laws of the Sknowledge except as to matters stated on my information				
		•		
Dated 10/20/11	O to			Not departure of an order of the charge and departure and an order of the charge
San Jose	(Am	COMPLAIN		WE
Dated $\frac{10/26/11}{San Jose}$ City	COMPLAIR	IANT'S SIG	TUHEVGUARQA	eminted -
DFEH-300-02 (12/99) BIRND DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING	DATE	EFILED:	L DEPT OF FAIR EMPLOYI BAKERSFIELD DIST	WENT & HOUSING IRICT STREET OF CALIFORNIA

EXEIBIT 16

PUBLIC ACCOMMODATION/RALPH/CIVIL CODE SECTIONS 51.5 & 54 * * * COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT WHICH INCORPORATES THE UNRUH GIVIL RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT AND CIVIL CODE SECTIONS 51.5 AND 54 COMPLAINANT S' NAME(S) Undicete Mr. of Mp., Il Individual QUAN, ANDREW (MR.) ADDRESS YELEPHONE NUMEER INCLUDE AREA CODE) 4023 Oak Manor Court XXX-XXX-XXXX CITY/STATE/ZIP COUNTY COUNTY CODE Hayward, CA 94542 Alameda 1000. NAMED IS THE PERSON, BUSINESS ESTABLISHMENT, PUBLIC AGCOMMODATION OR OTHER ENTITY THAT DISCRIMINATED AGAINST ME: Law School Admissions Council, Inc. (LSAC) PLEPHONE NUMBER (NOLUDE AREA COOR) 662 Penn Street 21,5,968-1001 CITY/STATE/ZIP ECCNITY OF Newtown, PA 18940 Out of State 000 CAUSE OF DISCRIMINATION BASED ON ICHEOK APPROPRIATE BOX(EST #ISEX RI DISABILITY CI MARITAL STATUS TI RELIGION DISTHER (SPECIFY) I SEXUAL ORIENTATION ED COLOR DATE MOST RECENT OR CONTINUING DISCHIMINATION TYPE OF COMPLAINT TOOK PLACE impnth, day, and year) September 13, 2011 THE PARTICULARS ARE. 1. Most recently on or about 9/13/11 I was denied reasonable accommodation to take the LSAT (Law School Admissions Test). 16. No reason was given for denial of my requested reasonable accommodistions. III. I believe I was denied reasonable accommodation in the form of additional test taking time, which is necessary due to my disabilities (Hypotonia, Dysgraphia, ADHD, Visual Processing Disorder, and back injury), which is a violation of Government Code, Section 12948. The Government Code incorporates Section 51 of the Civil Code. My belief is based on the following: A. On or about 9/2011 I advised the Accommodated Testing section of my medical need for reasonable accommodations. I also provided supporting medical documentation. B. Most recently on or about 9/13/11 I was notified that my requested accommodations were being IV. I am making this compleint on behalf of myself and all other disabled individuals who have been, are now, or will in the future be similarly aggrieved. Typed and melted for signature on October 7, 2011. declars under penalty of perjury under the laws of the State of California that the largeding is true and correct of my own knowledge except as to methers stated on my information and belief, and as to those matters I believe it to be true. COMPLAINANT'S SIGHATURE City COMPLAINANT'S SIGNATURE/GUARDIAN AD LITEM DFEH-300-02 (12/99) B:PNO DATE FILED: DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING THE OF

DEPT OF FAIR EMPLOYMENT & HOUSING BAKERSHELD DISTRICT OFFICE

Αī

EXELE II 17

* * * PUBLIC ACCOMMOL TION/RALPH/CIVIL CODE ST TIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDE	RTHE OFEH #	и-0033-00-р
PROVISIONS OF THE CALIFORNIA FAIR E AND HOUSING ACT WHICH INCORPORAT		·
	ACT AND CIVIL CODE SECTIONS 51,5 AND 5	4
COMPLAINANT'S NAME(S) (indicate Mr. or Ms., if Individ		estituterin der den den geren den den den den den den den den den d
WHITNEY, AUSTIN (MR.)	TO EQUIPME MITE	MBER (INCLUDE AREA CODE)
1050 Miller Avenue		XXX-XXX-XXXX
CITY/STATE/ZIP	COUNTY	COUNTY CODE
Berkeley, CA 94708	Alameda	001
DISCRIMINATED AGAINST ME:	LISHMENT, PUBLIC ACCOMMODATION OR OTH	ER ENTITY THAT
NAME(S) Law School Admissions Council, Inc.	/I S A C \	
ADDRESS		BER (INCLUDE AREA CODE)
662 Penn Street		215-968-1001
CITY/STATE/ZIP Newtown, PA 18940	COUNTY Out of State	COUNTY CODE OOO
CAUSE OF DISCRIMINATION BASED ON ICHECK APPRO		and the contracting the symposium of the information and assessment in the plant and consider the contract is the first for the contract in th
☐ RACE ☐ SEX ☐ DISABILITY ☐ COLOR ☐ AGE ☐ MARITAL STATUS	D RELIGION DINATIONAL ORIGIN/ANCESTRY DI OTHER (SPECIFY)	SEXUAL ORIENTATION
DATE MOST RECENT OR CONTINUING DISCRIMINATION		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) September THE PARTICULARS ARE:	21, 2011	Unruh
	reasonable accommodation to take the LSAT	(Law School
Admissions Test).		
the thirty was a stream from the stream of the		
II. No reason was given for denial of	my reasonable accommodation.	
III. I believe I was denied reasonable a	accommodation in which is necessary due to	my disabilities (Spinal
	neuropathic pain), which is a violation of Gove	· · · · · · · · · · · · · · · · · · ·
	corporates Section 51 of the Civil Code. My I	belief is based on the
following:		
A. On or about 8/28/11 Ladvised	the Accommodated Testing section of my me	edical need for
reasonable accommodation. 1	also provided supporting medical decumentati	ion.
D. On as about 0/04/44 I was made	ified that nort of our commented appropriation	
b. Off of about 9/21/11 I was not	ified that part of my requested accommodation	ин was being demed.
IV. I am making this complaint on beh	alf of myself and all other disabled individuals	who have been, are
now, or will in the future be simila	rly aggrieved.	
Typed and mailed for signature on October 28, 2011,		
	f the State of California that the foregoing is true and o	
knowledge except as to matters stated on my into	rmation and belief, and as to those matters I believe it	to be true.
	and aller	200 C C C C C C C C C C C C C C C C C C
Oated	The state of the s	Transfer E was
	COMPLAINANT	
A BECKELEN - A	Contracted 1011	-77811
city) (1	COMPLAINANT'S SIGNATURE/GUARDIAI	
	NEDT OF FAIR E	WPLOYMENT & HOUSING
DEPARTMENT OF FAIR EMPLOYMENT AND HOU	EXERCISE STATE OF THE STATE OF	STATE OF CALIFORNIA

EXELLBI 18

* * * PUBLIC ACCOMMOL .TION/RALPH/CIVIL CODE SE TIONS 51.5 & 54 * * *

COMPLAINT OF DISCRIMINATION UNDER THE	uran y	112 H-0033-00-p
PROVISIONS OF THE CALIFORNIA FAIR EMPLO		- And the state of
AND HOUSING ACT WHICH INCORPORATES TH		
RIGHTS ACT, THE RALPH CIVIL RIGHTS ACT A COMPLAINANT'S NAME (S) (Indicate Mr. or Ms., If Individual)	NO CIVIL GODE SECTIONS 51.5 AN	ID 54
VIELBAUM, KEVIN (MR.)		
ADDRESS	TO COUAK:	E NUMBER (INCLUDE AREA CODE)
812 Foothill Drive	Canal recity	XXX-XXX-XXXX
CITY/STATE/ZIP	- COUNTY	COUNTY CODE
San Matee, CA 94402	San Mateo	081
NAMED IS THE PERSON, BUSINESS ESTABLISHM DISCRIMINATED AGAINST ME:	ENT, PUBLIC ACCOMMODATION OR	OTHER ENTITY THAT
NAME(S) Law School Admissions Council, Inc. (LSAC	And the second s	and the second section of the second section is the second section of the section o
ADDRECS		NUMBER (INCLUDE AREA CODE)
662 Penn Street		215-968-1001
CITY/STATE/ZIP	COUNTY	COUNTY CODE
Newtown, PA 18940 CAUSE OF DISCRIMINATION BASED ON ICHECK APPROPRIATE	Out of State	000
O RACE OSEX O DISABILITY O REL O COLOR O AGE O MARITAL STATUS O OTI	BOATESII LIGION DINATIONAL ORIGIN/ANCESTR HER (SPECIFY)	
DATE MOST RECENT OR CONTINUING DISCRIMINATION		TYPE OF COMPLAINT
TOOK PLACE (month, day, and year) May 12, 2011 THE PARTICULARS ARE:		Unruh
t. Most recently on or about 5/12/11 I was	denied reasonable accommodation	to take the LOST Here.
School Admissions Test).	. Comod rodovnihote accommodation	TO take the LOAT ILAW
III. I believe I was denied reasonable accomme Learning Disabilities), which is a violation incorporates Section 5.1 of the Civil Code	n of Government Code, Section 129	948. The Government Code
A. On or about March 2011 I advised the reasonable accommodation. I also presented the reasonable accommodation.	ne Accommodated Testing section of covided supporting medical docume	of my medical need for ntation.
B. On or about 4/28/11 my initial reques about 5/12/11 I was notified that par	st for accommodation was denied in rt of my requested accommodation	n total. Most recently on or was being denied.
IV. I am making this complaint on behalf of a new, or will in the future be similarly ago Typed and mailed for signature on November 4, 2011.	myself and all other disabled individ grieved.	luals who have been, are
I declare under penalty of perjury under the laws of the St knowledge except as to matters stated on my information	tate of California that the foregoing is true and belief, and as to those matters I belie	and correct of my own we it to be true.
Dated 11/08/11	The second secon	
At San Mateo CA 2	COMPLAINANT'S SIGNA	TURE TO BELVE
City	COMPLAINANT'S SIGNATURE/GUAF	IDIAN AND LITEM NOV SE 2511
DFEH-300-02 (12/99) B:PND DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING	DATE FILED:	1873 OF FAIR MALANAS

EXELLBIT 19

1 2	CASE NAME: DFEH v. Law School Admission Council, Inc. (Austin Whitney, et al., Complainants)	
3	CASE NOS.: <u>U-201112-H-0021-00-p</u> , <u>U-201112-H-0008-00-p</u> , <u>U-201112-H-0029-00-p</u> ,	
4	U-201112-H-0027-00-p, U-200910-Q-0003-00-p, U-201112-H-0018-00-p, U-201112-H-0028-00-p, U-201112-H-0014-00-p,	
5	U-201112-H-0013-00-р, U-201112-H-0031-00-р, U-201112-H-0007-00-р, U-200910-G-0012-00-р, U-201112-H-0032-00-р, U-201112-H-0025-00-р,	
6	U-201112-H-0023-00-р, U-201112-H-0033-00-р, and U-201112-H-0035-00-р	
.7	RESPONDENT'S NOTICE OF TRANSFER OF PROCEEDINGS TO COURT	
8	I am a Respondent in this matter. I elect to transfer this proceeding to court in lieu of a	
9	hearing before the Fair Employment and Housing Commission, pursuant to Government Code	
10	section 12965, subdivision (c)(1).	
11	Dated: <u>2-22-12</u>	
12	Que Capell	
13	Respondents/Representative's Signature	
14		
15	Respondent(s) [Please print]	
16	Tulic Capel, Athorney for Law 5000/ Representative [Please print] Admission Council	
17	Representative [Please print] Admission Carcy	12
18	Address of Respondent, or if	
19	represented, address of Representative	
20	555 5. Happy Street 41-21 stop	
21.	Street LOS Macks, CA 90071	
22	City State Zip	ē
23	Telephone number of Respondent, or if	
24	represented, telephone number of Representative	
25		
26		
27		
To de contract	-6-	